

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual;
HALO BEAUTY PARTNERS, LLC, a
Nevada Limited Liability Company,

Plaintiffs,

V.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive.

Defendants.

NO. 2:20-cv-01606 BJR

SUPPLEMENTAL DECLARATION OF
MICHAEL P. BROWN IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS

Michael P. Brown declares as follows:

1. I am a lawyer with Gordon Tilden Thomas & Cordell LLP, counsel for Defendants in this matter. I make this declaration based on personal knowledge and my familiarity with the proceedings in this matter.

2. On the evening of January 13, 2021, Plaintiffs filed a praecipe and a Declaration of Lori Ann Barnhart (Dkts. 38, 38-1), in support of their opposition to Defendants' Motion to

SUPPLEMENTAL DECLARATION OF MICHAEL P.
BROWN - 1

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1 Dismiss on grounds of lack of personal jurisdiction (Dkt. 17). This is the second declaration Ms.
 2 Barnhart agreed to sign under oath within the space of one week. In that short period of time she
 3 agreed first to sign one on behalf of Defendants (prepared by me with her direct involvement and
 4 assistance), and then another prepared by Plaintiffs' counsel, containing irreconcilable statements
 5 of fact. I will refer to the version filed by Plaintiffs (Dkt. 38-1) as the "Second Declaration," and
 6 the one she was eager to sign on behalf of Defendants the week before as the "First Declaration."
 7 While Ms. Barnhart strongly suggests in the Second Declaration that *she* decided not to sign the
 8 First Declaration, in fact, as explained below, the emails irrefutably show that the *only* reason she
 9 did not sign it is that I decided it was best not to file it on the evening of January 6.
 10

11 3. The hastily-prepared Second Declaration comes after Ms. Barnhart sent me over
 12 80 emails during an 18-day period, telling a story that was: (1) reduced to writing; and (2)
 13 explicitly approved by Ms. Barnhart in the First Declaration on January 6. That *extremely* well-
 14 documented story is in most material respects perfectly inconsistent with the Second Declaration,
 15 which Plaintiffs' counsel prepared and filed in the *one day* after they first made contact with her.
 16

17 4. The Second Declaration is replete with plainly and provably false assertions of
 18 fact. Remarkably, the falsity of much of the Second Declaration is proven by the very email
 19 conversation on which it explicitly relies. Plaintiffs' attorneys publicly bragged on Twitter that
 20 they had these emails and reviewed them before preparing the Second Declaration and procuring
 21 Ms. Barnhart's sworn signature on it.¹ But they deliberately and without justification withheld
 22 them from the Court, presumably because, as demonstrated below, they are flatly inconsistent
 23 with the declaration they prepared and put in front of Ms. Barnhart to sign.² The failure to attach
 24

38 1 Attached as Exhibit A is a true and correct copy of a tweet posted by Plaintiffs' lead counsel, Michael Saltz, on
 39 January 15, 2021.

40 2 See Dkt. 38-1 at ¶ 21 n.2. Plaintiffs' counsel explains the failure to include the emails by stating: (1) Ms.
 41 Barnhart now believes she had an attorney-client relationship with me; and (2) the emails contain sensitive health
 42 information. This is frivolous. As to the first, Plaintiffs' counsel knows full well that a person cannot file a
 43 declaration characterizing the contents of emails in order to establish some argument, and at the same time withhold
 44 the emails themselves on grounds of "privilege." As to the second, the vast majority of emails between Ms. Barnhart
 45 and I—including emails that Plaintiffs' characterize (inaccurately) in the Second Declaration—contain no health
 information at all, and if and to the extent any did, that information could easily have been redacted.

1 the emails renders inadmissible every assertion from which they purport to be derived, that is,
 2 paragraphs 20-27.³
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4 5. The Second Declaration should be disregarded for the additional reason that Ms.
 5 Barnhart may not have fully understood what she was signing or how the Second Declaration
 6 would be used by Plaintiffs' counsel. This issue merits the Court's further attention.⁴
 7

8 6. Notwithstanding these compelling evidentiary grounds for disregarding the
 9 Second Declaration, it is important to address the merits of the Second Declaration, because
 10 many of its assertions are very serious and very false.
 11

12 7. Section I below contains an account of the events leading to Ms. Barnhart signing
 13 of the Second Declaration. I provide historical context for her decision on January 12 to suddenly
 14 recant every material fact she had clearly, voluntarily, and repeatedly represented to me during
 15 the 18 days from December 24 through January 10, and which she was very *eager* to confirm in
 16 a sworn declaration on January 6, before I decided against using that declaration. I believe the
 17 context provided in Section I, in Ms. Barnhart's own words, strongly suggests that the *reason* she
 18 recanted, in one day, the story she carefully told me over a period of 18 days and in over 100
 19 emails, was her desperation to be freed from what she described as a campaign of abuse,
 20 harassment, stalking, and threats from Plaintiffs' attorney Michael Saltz, and the crushing
 21 negative social media frenzy he engineered and aimed at her.⁵ Section II addresses the numerous
 22 falsities contained in the Second Declaration.
 23

24 8. I am attaching the relevant emails, with the exception of those containing
 25 especially sensitive health information, despite Ms. Barnhart's apparent suggestion that she and I
 26 had an attorney-client relationship (which I deny). Any such privilege has been waived by virtue
 27 of the fact that the Second Declaration characterizes (falsely) my email and telephonic
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29 ³ Fed. R. Evid. 1002. *See Medina v. Multaler, Inc.*, 547 F. Supp. 2d 1099, 1122 (C.D. Cal. 2007) (references to
 30 the content of e-mails violates the best evidence rule).

31 ⁴ I have requested the Court's guidance on the manner in which documents pertaining to this concern may be
 32 submitted for the Court's consideration while safeguarding, to the extent possible, Ms. Barnhart's privacy interests.

33 ⁵ The sealed filing provides additional insight into why Ms. Barnhart recanted in this manner.

1 conversation with Ms. Barnhart, and relies on those mischaracterizations to accuse me of
 2 wrongdoing. Also, I have an express right under RPC 1.6(b)(5) to respond to these very serious
 3 allegations against me personally.
 4

5 **I. EVENTS LEADING TO MS. BARNHART'S SUDDEN RECANTATION**

6 9. Ms. Barnhart made initial contact with me via email on December 24, 2020.⁶ She
 10 explained she understood I was Ms. Paulson's attorney, and stated: "I am writing to you because
 11 the opposing counsel [Michael Saltz] has been harassing people including me on twitter and has
 12 brought me up in the recent filings."⁷ She went on to explain "I have done nothing illegal here
 13 and this attorney [Mr. Saltz] took it upon himself to dox me . . . in his latest filing which has
 14 been reviewed on YouTube by numerous people."⁸ From that point forward, over an 18-day
 15 period and in more than 100 emails to me and two telephone calls, Ms. Barnhart *consistently*
 16 reiterated that:
 17

- 22 (1) she was deeply sympathetic to Ms. Paulson with respect to the treatment she was
 23 receiving on social media related to this dispute;
- 25 (2) she understood her relationship with Ms. Paulson to be *very limited*;
- 27 (3) she was furious, and sometimes despairing, at having been abusively "outed" (or
 28 "doxxed"⁹) by Plaintiffs' counsel Michael Saltz in a declaration filed in this matter
 29 (Dkt. 29) on December 24, 2020, in what she viewed as: (a) retribution for what
 30 she had said in a Twitter "spat" between the two of them in November 2020; and
 31 (b) as a public threat to anyone else who would support Ms. Paulson or challenge
 32 Mr. Saltz. That anger and despair deepened when Mr. Saltz filed a *sworn*
 33 declaration in which he attested, with no reasonable grounds for doing so, that he
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39
 40 ⁶ Attached hereto as Exhibit B is a compendium of true and correct screenshots of my email exchanges with Ms.
 41 Barnhart.

42 ⁷ Ex. B-1.

43 ⁸ *Id.*

44 ⁹ To "dox" or "doxx" is to publicly identify or publish private information about someone for the purpose of
 45 retribution, harassment or humiliation. See *Vangheluwe v. Got News, LLC*, 365 F. Supp.3d 850, 858-59 (E.D. Mich.
 2019).

1 had completed an “investigation” and had “determined” that Ms. Barnhart
 2 engaged in a “concerted effort” to “hide evidence” in this lawsuit.¹⁰
 3

4 10. The “doxing” Ms. Barnhart was upset over was Plaintiffs’ January 4 filing of a
 5 declaration from Kim Fulmer (Dkt. 27-3), submitted in opposition to Defendants’ Motion to
 6 Dismiss on personal jurisdiction grounds (Dkt. 17). Ms. Fulmer had a longstanding Twitter
 7 “feud” with Ms. Barnhart, which was *entirely* unrelated to this lawsuit. Plaintiffs located her and
 8 prepared and filed a declaration from her, ostensibly to buttress their argument in favor of
 9 personal jurisdiction. But they chose to include in that declaration very sensitive personal
 10 information about Ms. Barnhart, regarding an *eight-year-old* criminal charge in an entirely
 11 unrelated matter.¹¹ They also included a detailed recitation of the totally irrelevant Twitter feud
 12 from seven months prior, including screenshots showing Ms. Barnhart responding to threats and
 13 harassment from others, by stating that if they “come for me” she has friends in biker gangs that
 14 will protect her.¹² They did not include the threatening tweets Ms. Barnhart was responding to.¹³
 15 In her declaration Ms. Fulmer testified that because of the May 2020 tweets, she “continues to be
 16 in reasonable fear for my and my family’s personal safety from Ms. Barnhart and [Defendant]
 17 Ms. Paulson.” This testimony is not credible¹⁴ and, more importantly, has *nothing to do* with
 18 personal jurisdiction over Defendants in this lawsuit.
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 34 ¹⁰ Dkt. 30-1 at ¶ 17.
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 36 ¹¹ Dkt. 27-3 at ¶ 15. That charge was later dismissed at the request of the prosecutor, but that important fact was
 37 omitted from the Fulmer Declaration.
 38 ¹² *Id.* at ¶ 9.
 39 ¹³ *Id.*, see Ex. B at 9.
 40 ¹⁴ *Id.* at ¶ 15. This testimony is not believable. Ms. Barnhart apologized to Ms. Fulmer in August 2020 for the
 41 earlier tweets, and Ms. Fulmer accepted that apology on August 18, 2020, after which the two had pleasant and
 42 friendly Twitter interactions. Dkt. 38-1 at ¶ 18. Also, it is not plausible Ms. Fulmer has lived in constant
 43 “reasonable” fear of Ms. Barnhart since May 2020, but apparently chose to do nothing about reporting that threat
 44 until seven months later, and then chose to report it by filing a declaration in an unrelated civil lawsuit in Seattle
 45 (Ms. Fulmer lives in North Carolina). Finally, Ms. Barnhart explained that, *at the time of the “threatening” tweet*,
 Ms. Fulmer and her Twitter friends laughed it off as a joke and made fun of Ms. Barnhart for making it. Ex. B at
 107, 112.

1 11. The total irrelevance of the “biker gang” tweet and the eight-year-old criminal
 2 charge is underscored by the fact that Plaintiffs did not rely on those facts or those declaration
 3 paragraphs in their Response Brief.¹⁵ Ms. Barnhart believed, quite reasonably under the
 4 circumstances, that these were included for the purpose of harassing and intimidating her, and
 5 punishing her for having offended Mr. Saltz in a Twitter exchange with him in November
 6 2020.¹⁶ That exchange began on November 4, 2020, when Ms. Barnhart posted a Tweet in which
 7 she questioned whether Mr. Saltz was a “real lawyer”—she was honestly skeptical because she
 8 did not think “real” lawyers litigated their cases on Twitter.¹⁷ She later acknowledged to me that
 9 this tweet was “rude.”¹⁸ His response was to challenge her to meet him in his office in person to
 10 discuss her tweet, and to threaten that he would sue her over it.¹⁹ He posted that threat to her
 11 once, and then posted it *again* later that day, “tagging” other Twitter accounts to that posting—
 12 accounts that, she explained, would go on to assist in the subsequent online harassment.²⁰ Mr.
 13 Saltz then repeated that “invitation” *again* in another tweet addressed specifically to her on
 14 November 6, 2020.²¹

15 12. The Fulmer Declaration also included the complete work email address and direct
 16 telephone number (at the Washington Department of Transportation) for a person Plaintiffs
 17 believed to be Ms. Barnhart.²² There was no legitimate reason to do this. It would have been a
 18 very simple matter to redact enough of that information to demonstrate that the phone number
 19 was a Washington number, and that the email address was a WDOT email address, while not
 20 revealing enough to allow that information to be used to make unwanted contact with Ms.
 21

22 ¹⁵ Dkt. 27 at 4 n.25 (the only references in the brief to the Fulmer Declaration).

23 ¹⁶ Ex. B at 129.

24 ¹⁷ Ex. B at 32.

25 ¹⁸ *Id.*; *see also id.* at 24 (“I’ve been rude to him that’s all I’m guilty of.”).

26 ¹⁹ Attached as Exhibit E is a true and correct copy of a November 4, 2020 tweet posted twice by Mr. Saltz
 27 addressed to Ms. Barnhart.

28 ²⁰ *Id.* “Tagging” refers to adding other Twitter “addresses” in a tweet, to ensure that those accounts receive the
 29 tweet you have sent.

30 ²¹ Ex. B at 25.

31 ²² *Id.* at ¶ 10.

Barnhart. Indeed, Plaintiffs' counsel took great care to redact the contact information for their clients, in the exhibits that contained that information.²³ They even took the time to redact the name of the Westbrooks' pet from their lease agreement, apparently concerned about the dog's privacy interest.²⁴ They apparently also decided that Ms. Barnhart, a non-party witness, did not deserve that courtesy.

13. As Mr. Saltz must have expected and intended, those irrelevant but damaging portions of the Fulmer Declaration were broadcasted to the massive social media audience that he played an important role in creating. In one email, Ms. Barnhart explained in a despairing tone: "Thousands of people hate me. There are videos that will never go away and documents spread over the entire internet that will never go away."²⁵ In another, she lamented: "Everyone believes what he [Mr. Saltz] is saying about me. Over a million people know all about me."²⁶ In yet another, she explained: "I've had personal information shared about me, videos made berating me, fearful for my kids and my grandkids safety, my safety . . . had to deal with issues of incidents that happened 8 years ago [the 2012 criminal charge that Plaintiffs needlessly exposed] . . ."²⁷ In still another, she wrote: "I've already been tried and convicted."²⁸ And in another: "The only thing I wanted to keep private they have spread all over the internet."²⁹

14. One of those videos—by a YouTube channel operated under the name "CreepShow Art"—was seventeen minutes long and dedicated almost entirely to abusing Ms. Barnhart over the contents of the Fulmer Declaration. It has so far drawn over 200,000 views.³⁰ Another video, published by a YouTube channel operator named Emily D. Baker—who Mr.

²³ Dkt. 27-2 at 26.

²⁴ *Id.*

²⁵ Ex. B at 165.

²⁶ Ex. B at 148.

²⁷ Ex. B at 129.

²⁸ Ex. B at 167.

²⁹ Ex. B at 18.

³⁰ Attached hereto as Ex. F is a screenshot from this video, showing the number of views. The video can be found at <https://www.youtube.com/watch?v=-OXRwbD2QKc&feature=youtu.be>.

Saltz personally promotes and frequently communicates with publicly on his Twitter account—
 also predictably “covered” this declaration. She opined to her very large audience that, in putting
 Ms. Barnhart’s 2012 criminal charge into the Fulmer Declaration, Mr. Saltz was motivated at
 least in part by a desire to retaliate against Ms. Barnhart, for what Ms. Baker referred to as Ms.
 Barnhart “riling” Mr. Saltz in an earlier tweet. That video has so far drawn over 143,000 views.³¹
 Ms. Barnhart was especially troubled by the fact that the story being spread on social media, by
 Ms. Baker and others, was that Ms. Barnhart “deserved” the deluge of online abuse she was
 receiving after the filing of the Fulmer Declaration, because she had dared to be rude to an
 attorney.³²

15. Ms. Barnhart told me that, in an attempt to escape the public harassment, she
 largely removed herself from social media after the Fulmer Declaration was filed and publicized.
 Mr. Saltz learned that Ms. Barnhart had done this. On January 1, 2021 he also learned from a
 friend of Ms. Barnhart that she was suffering serious health effects since the filing of the Fulmer
 Declaration and ensuing harassment.³³ That friend *pleaded* with him to leave her alone: “You are
 causing harm to her health. Please, I beg you, leave her out of this.”³⁴ Instead of backing off, or
 proceeding with the subpoena he had said he was going to issue to her, Mr. Saltz responded by
 intensifying the pressure directly on Ms. Barnhart. The same day he learned about her
 compromised health, he sent several “direct messages” via Twitter to that same friend of Ms.
 Barnhart, asking that she deliver to Ms. Barnhart, on his behalf, the following threat: Ms.

Barnhart could “get into trouble” if she did not “cooperate with us and tell us what she knows

³¹ Attached hereto as Ex. G is a screenshot from that video.

³² Ex. B at 31 (Ms. Baker used much more “colorful” language in her taunts directed at Ms. Barnhart).

³³ Attached as Exhibit I is a true and correct screenshot of this message.

³⁴ *Id.*

1 privately and voluntarily,” but Mr. Saltz “wanted to avoid all that, find out what she knows, and
 2 *let her go.*”³⁵
 3

4 16. On January 4—just three days after sending this “do what we say or else”
 5 message to Ms. Barnhart—Mr. Saltz filed a declaration in this Court, swearing under oath that he
 6 had *not* sent Ms. Barnhart “any direct messages, let alone *any* messages of a harassing or
 7 threatening nature.”³⁶ But his January 1st message to Ms. Barnhart *was* sent via “direct message,”
 8 albeit to an intermediary who he instructed to deliver it to Ms. Barnhart. And it *was*
 9 “threatening”—Ms. Barnhart (reasonably) took it that way. *See* Section II-A-3, below.
 10

11 17. Mr. Saltz’s threat increased Ms. Barnhart’s anxiety and fear. She told me she had
 12 previously seen a tweet from Mr. Saltz, related to this case, in which he responded in a
 13 threatening manner to a tweet from a different woman. That woman simply said she had “heard”
 14 other people say he’s not really the Westbrooks’ attorney, and politely asked “Can you
 15 confirm?” His response was to threaten to “turn” his “prosecutorial attention” to her.³⁷ Ms.
 16 Barnhart was convinced—despite my attempts to explain otherwise—that she was going to be
 17 sued and thrown in jail simply because she exercised her right to remove her information from
 18 social media.³⁸
 19

20 18. In his declaration, Mr. Saltz also stated that he had *personally* conducted an
 21 “investigation” and “was able to determine” that Ms. Barnhart had engaged in a “concerted
 22 effort” with Ms. Paulson to “hide . . . evidence of a known connection between Defendants and
 23 the person known to me as Lori Ann Barnhart.”³⁹ His only grounds for that “determination” was
 24 the fact that Ms. Barnhart had removed herself from social media after being doxed in the
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27
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 29 35 Ex. B at 121-24 (emphasis added). Specifically, Mr. Saltz was telling Ms. Barnhart she could “get in trouble”
 30 simply because she removed her own social media accounts, in response to the abuse she received after the filing of
 31 the Fulmer Declaration.
 32

33 36 Dkt. 30-1 at ¶ 8 (emphasis added).

34 37 A true and correct copy of that Twitter exchange is attached as Exhibit H (emphasis added).

35 38 Ex. B at 129, 145, 165.

36 39 Dkt. 30-1 at ¶ 17.

1 Fulmer Declaration. As he expected and intended, Mr. Saltz's unfounded sworn "determination"
 2 of Ms. Barnhart's (and Defendants') guilt was broadcasted to a huge social media audience.⁴⁰
 3

4 19. Ms. Barnhart eventually appeared to surrender to the proposition that attorneys
 5 are permitted to use their power and status to abuse and retaliate against members of the public
 6 who offend them, and nothing will be done about it. In an email dated January 8, 2021, she
 7 wrote: "It's very obvious that this [Mr. Saltz's] behavior is legal. A successful high powered
 8 attorney that wins all his cases knows the law. I will let him continue with it. Everyone believes
 9 what he is saying about me."⁴¹
 10

11 20. I repeatedly tried to calm her fears by explaining that she had broken no laws and
 12 had (as far as I could tell) done nothing that would justify making her a defendant in this lawsuit.
 13 Those assurances did not seem to do much good.⁴² She was convinced that she was going to jail,
 14 but wrote: "Jail would be easier than what I am going through now."⁴³ On January 10, Ms.
 15 Barnhart began sending emails to me that I found confusing. In one email, she said: "I was being
 16 played this whole time. This is why [Mr. Saltz] keeps trying to entice me."⁴⁴ But then she began
 17 to suggest that I was somehow "in" on the same effort, because I "agreed to what they want."⁴⁵
 18 She wrote: "Nobody believes me, not even you."⁴⁶ I attempted to get clarification, explain that I
 19 had taken her at her word, and asked her to speak with me about her concerns,⁴⁷ but to no avail.
 20 She responded by saying "[t]hey have been tracking me . . . Oh well they had a great time with
 21 me."⁴⁸ She was convinced that she would go to jail over Mr. Saltz's baseless but publicly-sworn
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35 ⁴⁰ Attached as Exhibit G is a true and correct screenshot from Ms. Baker's January 5, 2021 "coverage" of Mr.
 36 Saltz's sworn but groundless "determination" that Ms. Barnhart conspired with Defendants to "hide evidence." The
 37 video can be found at: <https://www.youtube.com/watch?v=YDmAcXloPpo>.

38 ⁴¹ Ex. B at 148.

39 ⁴² Ex. B at 147, 153, 156, 162.

40 ⁴³ Ex. B at 145.

41 ⁴⁴ Ex. B at 157.

42 ⁴⁵ Ex. B at 167.

43 ⁴⁶ *Id.*

44 ⁴⁷ Ex. B at 168.

45 ⁴⁸ Ex. B at 170, 172.

1 and widely-published “determination” that she had conspired with Ms. Paulson to “hide
 2 evidence.”⁴⁹
 3

4 21. I now understand that, on January 12th, Ms. Barnhart contacted Plaintiffs’ counsel.
 5 She gave them her emails with me, and gave them total access to *all* of her social media
 6 accounts, including passwords. This, of course, is *much* more access to her personal life than
 7 they would have enjoyed had they served their subpoena and proceeded in that manner. The next
 8 day, Plaintiffs filed the Second Declaration. Having secured what he wanted from Ms. Barnhart,
 9 that evening Mr. Saltz—the person she blamed for leading a campaign of harassment against
 10 her—took to Twitter to “thank” Ms. Barnhart and call her a “class act.”⁵⁰ This, presumably, was
 11 what Mr. Saltz meant when he told her Ms. Barnhart would “let her go” if and only if she
 12 “cooperated.” But as explained in Section II, that cooperation came in the form of a declaration
 13 that is almost entirely, demonstrably, untrue.
 14

22 22. In a January 5, 2021 email to me, one week before she surrendered to the
 23 campaign of harassment, signed a false declaration, and handed over total access to her social
 24 media accounts to Mr. Saltz, Ms. Barnhart wrote: “I hope a judge sees what they do to innocent
 25 people.”⁵¹
 26

27 II. THE FALSE ASSERTIONS IN THE SECOND DECLARATION

28 A. Ms. Barnhart reviewed, suggested changes to, and was *very eager* to sign the First 29 Declaration before I called off the filing.

33 23. The Second Declaration states that Ms. Barnhart was reluctant to sign the First
 34 Declaration, because: (1) it unfairly “maligned” Mr. Saltz; and (2) she was “uncomfortable” with
 35 my suggestion that we might make “ tweaks” to the declaration after she signed. Indeed, the
 36 Second Declaration is drafted to give the impression that *Ms. Barnhart* decided not to sign the
 37
 38
 39

43 49 Ex. B at 145, 165, 172.
 44

50 Attached hereto as Exhibit J is a true and correct screenshot of Mr. Saltz’s tweet from January 13, 2021.

45 51 Ex. B at 24.

1 First Declaration because of these concerns.⁵² The email record exposes this as patently false,
 2 and also contradicts what the Second Declaration now says about Ms. Barnhart's "concerns."
 3

4 **1. The emails prove Ms. Barnhart was exceedingly *eager* to sign the First
 5 Declaration.**

6 24. On January 5, 2021, I emailed Ms. Barnhart to ask if she would be willing to sign
 7 a declaration describing the extent of her contact with Defendants, and responding to the
 8 Declaration of Kim Fulmer filed by Plaintiffs in this case.⁵³ Shortly after that, we talked by
 9 telephone for 39 minutes. After that call, Ms. Barnhart proceeded to prepare—without any
 10 involvement from me—and send me a 1500-word "statement" regarding her very limited
 11 relationship with Defendant Paulson, and the abuse and harassment she had suffered since
 12 Plaintiffs filed the Fulmer Declaration. That declaration was filed ostensibly in support of
 13 Plaintiffs' response to Defendants' personal jurisdiction challenge, but included totally
 14 irrelevant—but highly damaging—revelations about, and false accusations directed at, Ms.
 15 Barnhart.

16 25. On January 6, 2021, I exchanged three drafts of the First Declaration with Ms.
 17 Barnhart, as well as a large number of emails relating thereto. Indeed, on that *one day* we
 18 exchanged 53 emails.⁵⁴ I admonished her to read the drafts carefully and *not* to attest to anything
 19 just because I had included it.⁵⁵

20 26. Ms. Barnhart reviewed those drafts carefully, suggested changes, and was very
 21 eager to sign the final version.⁵⁶ Once I learned she did not have a scanner in her home, we
 22 exchanged several emails in the early evening about how she would sign the declaration. Ms.

23 52 Dkt. 38-1 at ¶ 22 ("Mr. Brown thereafter sought to have me sign a declaration on behalf of Defendants that did
 24 nothing more than attack and malign Plaintiffs' counsel, which I thought to be inappropriate and ultimately did not
 25 do.").

26 53 Ex. B at 26.

27 54 Ex. B at 40 – 118.

28 55 Ex. B at 54 ("Let me know if you see anything that looks incorrect (don't assume that I have the story right!");
 29 Ex. B at 69 ("I added a lot of stuff so please read it carefully and let me know what we should change."). It is my
 30 practice to admonish declarants in this manner.

31 56 Ex. B at 59, 175, 77-102.

Barnhart eagerly suggested several ways she could get the declaration signed, including using a scanning app on her phone, getting it to a friend to email to me, driving to a local store that has a scanner, and driving to a store to buy printer ink.⁵⁷ At approximately 6:30 p.m., I decided not to file the declaration that evening, and communicated that to Ms. Barnhart.⁵⁸ Even then, she repeated her eagerness to do whatever it took to sign it that evening, including by offering (again) to drive to Walmart. She explained she could do this despite the fact that it was after-hours, because she would be “up all night.”⁵⁹ She then sent another email asking whether she would need legal sized paper to print the declaration.⁶⁰ This is not the behavior of someone who is reluctant, uncomfortable, or feeling pressured to sign a declaration. It leaves no room for any conclusion other than that Ms. Barnhart would have eagerly signed it, were it not for my late change to the plan.

2. The accusation that I planned to make changes to the First Declaration without Ms. Barnhart’s express approval, is deliberately misleading.

27. The Second Declaration points out that I suggested to Ms. Barnhart that I might need to make “tweaks” to the First Declaration on the evening of January 6 after she signed it, and asserts that Ms. Barnhart was “uncomfortable” with that. Dkt. 38-1 at ¶ 23.⁶¹ This allegation is drafted intentionally to be misleading. *Of course* it is improper for an attorney to make changes to a declaration after it is signed, *unless* the declarant is informed of the change(s) and consents.⁶² The Second Declaration paraphrased the first sentence of the email I sent to Ms. Barnhart (mentioning the possibility of “tweaks”), but *intentionally* withheld the actual email and intentionally omitted any mention of the critical sentence that followed: “Of course I will not

⁵⁷ *Id.*

⁵⁸ *Id.* at 97.

⁵⁹ *Id.* at 100.

⁶⁰ *Id.* at 101.

⁶¹ When I made this statement I knew it would be difficult for Ms. Barnhart to print, sign, and return a signature page to me, and that the drafting and editing would carry on late into the night, such that having her sign and return a signature page multiple times would be prohibitively inconvenient. *See Ex. B* at 77-86.

⁶² I confirmed this with Legal Ethics expert Professor John Strait, Emeritus Professor of Law, Seattle University. Professor Strait will prepare a written confirmation of this should the Court desire.

1 make any changes without you reviewing them.”⁶³ Further, the suggestion that Ms. Barnhart was
 2 “uncomfortable” with this is belied by her conduct *after* receiving that email: she said nothing
 3 about any “discomfort,” and indeed proceeded to bend over backwards to do exactly as I had
 4 proposed, by looking for any possible way to execute the First Declaration.⁶⁴
 5

6 **3. Ms. Barnhart’s concern about the First Declaration unfairly “maligning”
 7 Mr. Saltz is contradicted by her eagerness to sign it, and her perfectly
 8 consistent descriptions of Mr. Saltz in “malignant” terms.**

9 28. Perhaps the most remarkable aspect of Ms. Barnhart’s recantation is her insistence
 10 that she thought it was “inappropriate” to “malign” Mr. Saltz. Dkt. 38-1 at ¶ 22. First, as
 11 explained above, Ms. Barnhart reviewed, edited, and was eager to sign the First Declaration,
 12 which was derived in part from her self-prepared “statement,” which included very unkind
 13 sentiments about Mr. Saltz.⁶⁵
 14

15 29. Second, the First Declaration was exceedingly *mild* in describing Ms. Barnhart’s
 16 actual feelings about Mr. Saltz, and what she recognized as his abusive behavior. When she first
 17 contacted Ms. Paulson after learning she had been unfairly exposed in the Fulmer Declaration,
 18 Ms. Barnhart referred to Mr. Saltz as “that slimy lawyer.”⁶⁶ In her communications to me, from
 19 the very first email, she likewise described him in what can only be called “malignant” terms:
 20 threatening, “harass[ing],” “pompous,” “arrogant,” “the creep,” and that “creepy, stalking
 21 attorney.”⁶⁷ Indeed, two days *after* the date on which she now claims she was uncomfortable
 22 signing the First Declaration because it unfairly maligned Mr. Saltz, Ms. Barnhart wrote the
 23 following to me: (“this man” refers to Mr. Saltz)⁶⁸:
 24

25 37 ⁶³ Ex. B at 88. The Court will see that this email contains no “health information,” and Plaintiffs’ counsel know
 26 full well that any privilege that might have attached to this email was intentionally waived when that very email was
 27 used to malign me. *Rock River Communications, Inc. v. Universal Music Group, Inc.*, 745 F.3d 343, 352 (9th Cir.
 28 2014); *Bittaker v. Woodford*, 331 F.3d 715, 719 (9th Cir. 2003).

29 41 ⁶⁴ Ex. B at 95-101.

30 42 ⁶⁵ Ex. B at 32.

31 43 ⁶⁶ Supplemental Declaration of Katherine Paulson (filed herewith), ¶ 3.

32 44 ⁶⁷ See Ex. B at 1, 8, 18, 19, 32.

33 45 ⁶⁸ Ex. B at 129.

1 I am disgusted that this man thinks it is okay to stalk, harass, and
 2 accuse me of committing crimes with zero proof of anything . . .
 3

4 I've had personal information shared about me, videos made
 5 berating me, fearful for my kids and my grandkids safety . . .
 6

7 Nobody has the right to threaten me with legal action as this man
 8 has done with his pompous and arrogant attitude. He is using me as
 9 an example . . . He is proud of it too.
 10

11 She blamed his filing of the Fulmer Declaration, his filing of his own declaration falsely
 12 accusing her of conspiring to “hide evidence,” and his conduct towards her on social media, for
 13 causing her anxiety, fear for her safety and her family’s, and more.⁶⁹
 14

15 30. Third, the record overwhelmingly contradicts the specific assertion in the Second
 16 Declaration, that “Mr. Saltz has not threatened me. Nor have I ever told Mr. Brown that Mr.
 17 Saltz threatened me,” and specifically belies her testimony that she did not take as “threatening”
 18 the series of direct messages Mr. Saltz’s sent to her, through an intermediary, on January 1,
 19 2021.⁷⁰ The email record conclusively refutes each of these statements:
 20

- 21 30(a) Ms. Barnhart’s *immediate* reaction when her friend forwarded Mr. Saltz’s
 22 threatening January 1, 2021 messages was this: “More *threats* directed at me!”⁷¹
- 23 30(b) In a January 7, 2021 email to me, Ms. Barnhart characterized Mr. Saltz’s
 24 messages as “basically telling me to cooperate or else.”⁷²
- 25 30(c) On January 8, 2021, Ms. Barnhart told me by email: “*Nobody has the right to*
 26 *threaten me with legal action as this man [Mr. Saltz] has done* with his pompous
 27 and arrogant attitude.”⁷³

41 ⁶⁹ *Id.*; see also *id.* at 165.
 42 ⁷⁰ Dkt. 38-1 at ¶ 27; 22.
 43 ⁷¹ Ex. B at 120-24 (emphasis added).
 44 ⁷² Ex B at 117.
 45 ⁷³ Ex. B at 129 (emphasis added).

1 30(d) On January 11, 2021, Ms. Barnhart said: “I can’t believe this world we live in
 2 where we can’t even tell people to leave us alone, *where people can threaten you*
 3 *and you just have to shut up and take it.*”⁷⁴
 4
 5

6 30(e) Also on January 11, 2021, Ms. Barnhart wrote, in reference to Mr. Saltz:
 7
 8 “[T]elling assholes to leave me alone apparently isn’t the right thing to do. It’s
 9 okay for people to dogpile and *threaten* me though.”⁷⁵
 10

11 Further, Ms. Barnhart reviewed, edited, and was very eager to sign a declaration that referred to
 12 “threats” she received from Mr. Saltz no fewer than three times.⁷⁶ She was *anything but*
 13 uncomfortable with those statements or with attesting to them under oath. Finally, Ms.
 14 Barnhart’s repeated statements, that Mr. Saltz was “stalking” and “harassing” her, only
 15 underscore that she felt his behavior was threatening.
 16
 17

18 **B. I did not “encourage” Ms. Barnhart to file bar grievances against Ms. Saltz nor did
 19 I “instruct” her how to do so.**

20 31. The Second Declaration alleges that I “tried to encourage [Ms. Barnhart] to file
 21 state bar complaints against” Mr. Saltz and instructed her on how to do it.⁷⁷ This, also, is simply
 22 false, and is proven so by the very email that it purports to characterize. When Ms. Barnhart first
 23 contacted me, she was upset over having highly sensitive personal information publicly exposed
 24 in the Fulmer Declaration. My initial response was to explain generally what she could do to
 25 respond. The paragraph that Plaintiffs’ characterize here, but do *not* provide to the Court, is as
 26 follows:⁷⁸
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 41 ⁷⁴ *Id.* at 175.
 42
 43

44 ⁷⁵ *Id.* at 172 (emphasis added).
 45

46 ⁷⁶ Ex. B at 71-72, 90-91.
 47

48 ⁷⁷ Dkt. 38-1 at ¶¶ 22, 26.
 49

50 ⁷⁸ Ex. B at 176.
 51

1 Unfortunately, I don't know if there is much we can do about it, other than to bring it to the Court's attention and
 2 object to it on your behalf. There is an attorney ethics rule saying a lawyer cannot use the legal system to harass or
 3 intimidate, and this filing seems to violate that rule. You can sign a statement that we can file, if you'd like, explaining
 4 what the filing has done to you and your family. You could also consider filing a complaint with the bar associations of
 5 Washington and California. That process moves very slowly, so it would not give you any quick relief.
 6

7 I believe this to be reasonable and truthful information. There is no "encouragement" here to file
 8 a bar grievance, or "instruction" on how to do so. Indeed, the last sentence is *discouragement*,
 9 and to my recollection Ms. Barnhart and I did not discuss this thereafter.
 10

11 **C. Ms. Paulson did not "tell" Ms. Barnhart not to contact Mr. Saltz and to contact me instead.**

12 32. In a similar vein, the Second Declaration asserts that Ms. Paulson "told [Ms. Barnhart] expressly not to contact Plaintiffs' Counsel but to contact her attorney, Michael Brown, instead." Dkt. 38-1 at ¶ 19. This is another blatant misrepresentation of fact. The Twitter exchange to which the Second Declaration refers (but does not include) shows that Ms. Paulson simply said this: "You *can* speak to my attorney *if you'd like*. He isn't sure if he can help."⁷⁹

13 **D. Ms. Barnhart repeatedly confirmed that her account of her relationship with Ms. Paulson was perfectly consistent with Ms. Paulson's.**

14 33. The Second Declaration states that Ms. Barnhart was "suspicious of my motives" in communicating with her regarding the subpoena, because the information she had would somehow contradict Defendants' arguments against personal jurisdiction.⁸⁰ This is demonstrably false.

15 34. This allegedly contradictory information, we now know, is the comical assertion in the Second Declaration, that Ms. Barnhart acted as Ms. Paulson's "agent" and "bulldog," awaiting "instructions" from her master as to what nefarious mission to carry out next in Ms. Paulson's name.⁸¹ Plaintiffs' counsel clearly drafted this, for Ms. Barnhart to sign, in an attempt

43 ⁷⁹ Second Supplemental Declaration of Katherine Paulson (filed herewith), ¶ 3 (emphasis added).
 44

45 ⁸⁰ Dkt. 38-1 at ¶ 25.

⁸¹ Dkt. 38-1 at ¶¶ 6-11.

1 to show a connection between Defendants and Washington State, because Ms. Barnhart is a
 2 resident of Washington.⁸² But Ms. Barnhart's previous communications to me told *exactly the*
 3 *opposite* of this television-script "enforcer" fantasy.
 4

5 35. In my first email to Ms. Barnhart, I explained that the "Washington" connection
 6 was the reason Plaintiffs' counsel targeted her for the doxing and other harassment she had
 7 written to me about.⁸³ Her response was emphatic: "Katie has *never asked me to do anything for*
 8 *her!* We tweeted on occasion but she *never instructed me to do anything nor would I.*"⁸⁴ Ms.
 9 Barnhart repeated that assertion, again with great emphasis, in the personal statement she
 10 prepared, entirely on her own, as the foundation for the First Declaration: "Katie has *never, ever,*
 11 *asked me to do anything for her.*"⁸⁵ Again, Plaintiffs' counsel publicly bragged that they read
 12 these emails before they prepared the Second Declaration. Yet they included in that declaration
 13 these assertions of fact that are directly refuted by Ms. Barnhart's own words, and procured Ms.
 14 Barnhart's sworn signature to that declaration, while deliberately withholding the evidence that
 15 plainly contradicts her testimony. The Declaration of Ms. Paulson, filed herewith, further
 16 addresses the merits of the fantastic tale of Ms. Barnhart's "agency" as Ms. Paulson's "bulldog."
 17

18 36. Another glaring area of contradiction, between Ms. Barnhart's own prior
 19 statements and the Second Declaration, is her testimony that during the period of their
 20 interactions online, Ms. Paulson knew she resided in Washington.⁸⁶ Indeed, Ms. Barnhart now
 21 testifies that she "frequently disclosed" this to Defendants.⁸⁷ But Ms. Barnhart emphatically
 22 confirmed to me, in our first conversation, that there was *no* reason for Ms. Paulson to have
 23

24
 25
 26
 27 ⁸² This "contact" with Washington would not support personal jurisdiction in any event, because it is unrelated to
 28 the claims in this lawsuit.
 29

30
 31 ⁸³ Ex. B at 2. At that time, I was not yet aware that Ms. Barnhart had had a Twitter spat with Plaintiffs' counsel
 32 in November 2020, such that Mr. Saltz had a personal ax to grind with Ms. Barnhart, in addition to wanting to use
 33 her to try to establish personal jurisdiction on behalf of his clients.
 34

35 ⁸⁴ Ex. B at 4 (emphasis added).
 36

37 ⁸⁵ *Id.* at 33 (emphasis added).
 38

39 ⁸⁶ Dkt. 38-1 at ¶¶ 8, 11.
 40

41 ⁸⁷ *Id.*

1 known where she lived. And then Ms. Barnhart proceeded to review, edit, and repeatedly express
 2 her eagerness to sign, the First Declaration, which stated “I have no reason to believe Ms.
 3 Paulson knew which state I lived in until recently.”⁸⁸
 4

5 37. Another example of Plaintiffs’ disregard for the truth is Ms. Barnhart’s sworn
 6 assertion, that she stopped supporting Defendants YouTube channel in August 2020, *because* she
 7 didn’t like “the toxic environment *Ms. Paulson was creating* with her content.”⁸⁹ Here again, her
 8 statements to me, orally and in the emails Plaintiffs withheld, told *exactly* the opposite story. In a
 9 phone call and several emails, Ms. Barnhart explained that she stopped supporting Ms. Paulson’s
 10 YouTube channel at that time because of the harassment Ms. Barnhart received *from* Ms.
 11 Paulson’s online enemies, including the “declarant” Kim Fulmer, who attacked Ms. Barnhart
 12 because she *continued to support* Ms. Paulson’s channel. In her January 5, 2021 personal
 13 statement, Ms. Barnhart explained:
 14

15 There are so many Twitter and YouTube trolls and sock accounts
 16 that would just follow me around *because I supported [Ms.*

17 *Paulson]. I tried to reason with them, but there is no reasoning
 18 with them . . . It got so bad that I stopped supporting [Ms.*

19 *Paulson] and then all the trolls were my best friends. They wanted
 20 me to join their hate groups and troll [Ms. Paulson].*⁹⁰

21 Ms. Barnhart repeated that account in a December 31, 2020 email: “She [Ms. Paulson] has done
 22 nothing wrong . . . I was standing up for what was right I was against bullying and harassment
 23 and I know [Ms. Paulson] is too. *I stopped supporting her because of them and their*
 24 *harassment.*⁹¹ It bears repeating: these are the emails Plaintiffs’ counsel bragged about reading
 25 before drafting the Second Declaration (but conspicuously failed to include with it).

26 ⁸⁸ Ex. 85 at ¶ 11. This is consistent with Ms. Barnhart’s January 5, 2021 personal statement, in which she
 27 explains that Ms. Paulson “doesn’t know much of anything about me.” Ex. 42.

28 ⁸⁹ Dkt. 38-1 at ¶ 12 (emphasis added).

29 ⁹⁰ Ex. B at 30-31 (emphasis added).

30 ⁹¹ Ex. B at 18 (emphasis added).

1 38. Another example is Ms. Barnhart’s statement in the Second Declaration, that
 2 “[t]hroughout a large portion of 2020, I was communicating with Ms. Paulson on Twitter on an
 3 extremely frequent basis, and otherwise not less than several times a week.”⁹² But to me she said:
 4 “We tweeted on occasion.”⁹³

5 39. Another example is Ms. Barnhart’s sworn assertion that she “also communicated
 6 with Ms. Paulson via email and direct messages.” Dkt. 38-1 at ¶ 6 (emphasis added). But in a
 7 January 5, 2021 email to me, she wrote about Ms. Paulson: “We have never spoke on the phone
 8 and she’s *never emailed me.*”⁹⁴

9 40. Another example is Ms. Barnhart’s new, sworn assertion that her “relationship
 10 with Ms. Paulson was *far more significant* than what Ms. Paulson represented in her declaration
 11 to the Court.”⁹⁵ But Ms. Paulson’s declaration described that relationship in exactly the same
 12 way that Ms. Barnhart was ready and eager to swear to in her First Declaration:

13 Ms. Paulson’s Declaration: “I have had very limited interactions with Ms.
 14 Barnhart, do not know her well, and do not consider her to be a friend at all, let
 15 alone my “best friend.””⁹⁶

16 Ms. Barnhart’s First Declaration: “Ms. Paulson and I have never been friends and
 17 have had very little direct contact . . . I understand she might have referred to me
 18 as “her best friend” when I sent a comment during one of her videos. This was
 19 obviously not meant literally, based on the very limited nature of my interactions
 20 with Ms. Paulson.”⁹⁷

21 Further, the story Ms. Barnhart was ready to swear to in the First Declaration was consistent with
 22 Ms. Barnhart’s earlier statements to me, that in April of 2020, she “reached out” to Ms. Paulson

40 ⁹² Dkt. 38-1 at ¶ 6.
 41

42 ⁹³ Ex. B at 4.

43 ⁹⁴ *Id.* at 33 (emphasis added).

44 ⁹⁵ Dkt. 38-1 at ¶ 12 (emphasis added).

45 ⁹⁶ Dkt. 34 at ¶ 6

46 ⁹⁷ Ex. B at 92-93.

and told her personal details about her life story, but that “was the only real conversation we had and it ended there.”⁹⁸

E. Ms. Barnhart's assertion—that she mistrusted me "from the very first interaction"—is flatly contradicted by her subsequent conduct.

41. In the Second Declaration Ms. Barnhart testifies that she mistrusted me “[f]rom the very first interaction” she had with me.⁹⁹ Her conduct tells the exact opposite story. After my initial response to Ms. Barnhart’s email to me, Ms. Barnhart sent me four consecutive emails that same day, before I responded to any of them.¹⁰⁰ Over the subsequent 17 days, she would go on to send me at least 77 emails and participate in two long telephone conversations. In those emails and calls, she shared with me not only her feelings about how she was treated by Mr. Saltz, and the story of her limited relationship with Ms. Paulson, but also voluntary shared extremely personal details about her life history, health, and family.¹⁰¹ People do not behave in this manner, over a period of weeks in extremely frequent communication, towards others whom they mistrust “from the very first interaction.”

42. Further, the “reason” Ms. Barnhart gives for mistrusting me from “the very first interaction,” is an email exchange that came *13 days after* our “first interaction,” and in fact much closer (five days) to our last interaction. Ms. Barnhart says that I “led her to believe” that Plaintiffs filed the Fulmer Declaration on December 24, 2020, in order to “intentionally mess with me,” rather than because it was a filing deadline.¹⁰² That is not what happened. On January 6, 2021, Ms. Barnhart *emailed me*, stating (among other things): “They purposely did that late Christmas Eve because they knew nothing could be done about it until the following Monday. They laughed and said merry Christmas.”¹⁰³ In the rush of what was the afternoon of the filing

98 Ex. B at 28.

⁹⁹ Dkt. 38-1 at ¶ 20.

¹⁰⁰ Ex. 30 at 3-6.

¹⁰¹ See, e.g., Ex. B at 10.

¹⁰² Dkt. 38-1 at ¶ 20.

103 Ex. B at 62.

1 deadline for Defendants' Reply, it did not occur to me to correct Ms. Barnhart as to this detail
 2 and explain that the *timing* was not intentional. In my response, I simply said: "The Christmas
 3 Eve timing of this is especially nice, right?"¹⁰⁴
 4

5

6 **F. The Court should reject Plaintiffs' transparent attempt to blame me, and Ms.**
Barnhart, for *their* reckless publication of contact information for the wrong "Lori
Barnhart."

7

8 43. Plaintiffs and declarant Kim Fulmer intentionally included in the Fulmer
 9 Declaration the direct work telephone number and email address (at the Washington Department
 10 of Transportation) of a woman they believed to be Ms. Barnhart.¹⁰⁵ There was no reason not to
 11 redact at least enough of these to protect the target from unwanted contact. But it turns out Ms.
 12 Fulmer and Plaintiffs were reckless in their attempt to publicly expose Ms. Barnhart's contact
 13 information; the phone number and email address they published belonged to a different Lori
 14 Barnhart. In emails to me on December 24, 25 and 26, Ms. Barnhart informed me of this, and
 15 expressed concern that the "other" Lori Barnhart should be notified so she would not be
 16 surprised if she received unwanted contact at her work phone number or email address. She
 17 wrote: "I am going to try to contact her or her boss."¹⁰⁶ On Friday, December 26, I emailed the
 18 other Lori Barnhart at the WDOT address to explain what I understood to be the mix-up.¹⁰⁷ On
 19 December 28, 2020 (the first business day since I learned of the doxing mistake), I called a
 20 general WDOT line, and was eventually connected with the Assistant Attorney General who is
 21 assigned to WDOT. I explained the situation to him as well, and sent him a copy of the Fulmer
 22 Declaration.¹⁰⁸ He said he would contact her and follow up.

37

38 ¹⁰⁴ *Id.* at 63. Had I stopped and reflected, I might have thought to explain that while the abusive content and
 39 agenda were of Plaintiffs' choosing, the timing was not. In any event, I did not "lead Ms. Barnhart to believe" that
 40 the timing of the filing was nefarious. At most, I did not think to correct *her* belief in that regard.

41 ¹⁰⁵ Dkt. 27-3 at ¶ 10.

42 ¹⁰⁶ Ex. B at 4, 6, 9.

43 ¹⁰⁷ Attached as Exhibit C is a true and correct copy of the email I sent to the "other" Lori Barnhart on December
 44 26, 2020.

45 ¹⁰⁸ Attached as Exhibit D is a true and correct copy of the email I sent to the an Assistant Attorney General on
 December 28, 2020, immediately after a phone call with him.

1 44. I clearly informed Ms. Barnhart that I had taken these steps to address her
 2 concerns.¹⁰⁹ She responded that same day by saying “thank you.”¹¹⁰ She repeatedly asked me for
 3 “updates” on what I had heard back from the other Lori or the Attorney General’s office. I
 4 repeatedly responded that I had heard nothing of substance.
 5

6 45. Ms. Barnhart now accuses *me* of failing to inform Mr. Saltz of his mistake in this
 7 regard. But from the very outset Ms. Barnhart repeatedly told me *she* had sent Mr. Saltz direct
 8 messages to his Twitter account, explaining the mistake.¹¹¹ Indeed, she wrote to me that she had
 9 told Mr. Saltz that she was not the “WDOT Lori” *before* he filed the Fulmer Declaration, but “he
 10 filed it anyway.”¹¹² She also informed me that she had made a public post on Twitter saying the
 11 same thing.¹¹³ Indeed, in a January 6, 2021 email, Ms. Barnhart correctly blamed Mr. Saltz for
 12 ignoring *her* notice to him, that he had exposed the information for the wrong Lori Barnhart:
 13 “Even though I notified him he had the wrong information he has continued with this an even
 14 filed the 17-page document. *He has not corrected his error since.*”¹¹⁴ The only basis I had for
 15 “informing” Mr. Saltz that he doxed the wrong Lori Barnhart, was Ms. Barnhart’s statement to
 16 me saying so. I saw little to be gained by my reporting the same information indirectly that he
 17 already had directly from the source.¹¹⁵
 18

19 46. Further, Ms. Barnhart and I had repeatedly discussed her concerns about being
 20 publicly “linked” to Ms. Paulson’s side of this dispute, in light of the fact that she was being
 21 targeted by Ms. Saltz and many others on social media *because* of her prior statements of support
 22 for Ms. Paulson. I did not believe it was in Ms. Barnhart’s *or* Ms. Paulson’s interest for
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37 ¹⁰⁹ Ex. B at 11.
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39 ¹¹⁰ Ex. B at 12.
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41 ¹¹¹ Ex. B at 51.
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43 ¹¹² *Id.* at 112.
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45 ¹¹³ *Id.* at 37.
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47 ¹¹⁴ *Id.* at 66 (emphasis added).
 48

49 ¹¹⁵ Plaintiffs’ excuse for not correcting their mistake appears to be that they didn’t believe Ms. Barnhart.
 50 Apparently, they didn’t bother even to look into the matter, choosing instead to ignore it. But there is no reason to
 51 think they would have believed *me*, telling them what Ms. Barnhart told me, any more than they believed her.
 52

1 Plaintiffs' counsel to know I was in contact with Ms. Barnhart, especially given his penchant for
 2 using social media as a weapon in this case. Ms. Barnhart *agreed* that this made sense. Indeed,
 3 prior to January 6, 2021, Ms. Barnhart expressed ambivalence about filing a declaration that
 4 would be perceived as supporting Ms. Paulson in this lawsuit. This is the reason we included, in
 5 the second and final draft of the First Declaration, a statement that Ms. Barnhart was not
 6 "supporting" Ms. Paulson's side in this dispute, but instead only wanted to point out the abusive
 7 nature of the Fulmer Declaration (and set the record straight with regard to her relationship with
 8 Ms. Paulson).¹¹⁶ My emails to her also echo this concern. For example, in a December 30, 2020
 9 email from me to Ms. Barnhart, I explained that I had spoken with Mr. Saltz, but assured her that
 10 "I did not disclose that you and I are in touch."¹¹⁷ Another email from me to her that day
 11 reiterates that "[t]hey are working very hard to try to paint you two as a 'team' and that is not
 12 good for either of you."¹¹⁸

22 47. The Second Declaration states that Ms. Barnhart was "shocked and horrified" that
 23 *I* did not repeat to Mr. Saltz what she had already told him, before and after he filed the Fulmer
 24 Declaration. It accuses me of keeping Plaintiffs' recklessness secret to get a "tactical advantage"
 25 that was *against* Ms. Barnhart's interests. This is nonsense. Ms. Barnhart agreed—quite
 26 reasonably—that it was in *her* interests to keep her cooperation with me secret from Plaintiffs for
 27 the time being. The inclusion of the "disclaimer" in the First Declaration was to protect *her* in
 28 that regard. And she *never* pushed back or told me it was more important for me to repeat her
 29 story to Mr. Saltz, than to maintain secrecy over her cooperation with Ms. Paulson. Further, once
 30 the "other" Lori Barnhart was informed, as well as her employer and the Attorney General's
 31 office, the threat posed by Plaintiffs' counsel's (and Ms. Fulmer's) recklessness had been
 32 addressed.

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¹¹⁶ Ex. B: 70-71, 89-90.
 44
 45 ¹¹⁷ Ex. B at 13.
 ¹¹⁸ Ex. B at 14.

1 48. It is remarkable that Plaintiffs would attempt to shift blame to me for this
 2 incident, and more outrageous that they apparently convinced Ms. Barnhart to take blame
 3 herself,¹¹⁹ while they take *no* responsibility whatsoever, either for their intentional inclusion of
 4 damaging but irrelevant facts in the Fulmer Declaration, or their reckless publication—to
 5 hundreds of thousands of persons, in videos that will *never* go away—of the wrong person’s
 6 contact information at a government agency. Indeed, as of this date, neither Plaintiffs nor Ms.
 7 Fulmer has corrected that filing, leaving on the record the contact information of a woman who
 8 has *nothing* to do with this case, and leaving that information connected to a criminal charge that
 9 is not hers, as well as salacious allegations that she associates with murderous biker gangs and
 10 poses a danger to the safety of others.

11 **G. My statements to Ms. Barnhart regarding the subpoena were to accept service,
 12 preserve evidence, make appropriate objections, and abide by the Court’s order.**

13 49. On or about January 7, 2021, I received a copy of a subpoena that Plaintiffs
 14 intended to serve on Ms. Barnhart. I forwarded the subpoena to Ms. Barnhart, and discussed with
 15 her what her options were in responding, once she was served.¹²⁰ I made it clear to her, several
 16 times, that she should not destroy any evidence related to this dispute, and instructed her that she
 17 should not attempt to evade service, but should accept it if and when it was attempted and then
 18 respond or object as appropriate.¹²¹

19 50. While the Second Declaration asserts that Ms. Barnhart just wanted to quickly
 20 comply with the subpoena, the emails tell the opposite story. In fact, she expressed great upset
 21 and defiance at being subpoenaed: “He has no business telling me to hand over anything.”¹²²
 22 Because Ms. Barnhart appeared to feel overwhelmed at the prospect of responding to a
 23 subpoena, I mentioned to her that *one* of the things that will happen if there is an objection is that

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¹¹⁹ Dkt. 38-1 at ¶ 28.

¹²⁰ Ex. B at 119.

¹²¹ Ex. B at 130, 138, 139, 153, 162.

¹²² Ex. B at 129.

1 there will be more time before she would have to respond.¹²³ I never suggested that she make any
2 baseless objections or that she object, as the Second Declaration asserts, “solely for the purpose
3 of delay.”¹²⁴
4
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7

8 I declare pursuant to the laws of perjury of the United States of America that the
9 foregoing factual assertions are true and correct to the best of my knowledge.
10
11

12 DATED this 22nd day of January, 2021, at Seattle, Washington.
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14



15 Michael P. Brown, WSBA #45618
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¹²³ Ex. B at 130. Ms. Barnhart expressed concern that she did not know how to search her social media accounts to find responsive documents, and had no money to have that done.

¹²⁴ Dkt. 38-1 at ¶ 26.

Ex. A

Top **Latest** People Photos Videos

 **Michael_Saltz** @MichaelSaltzEsq · Jan 15 · [View profile](#) · [Follow](#) · [Block](#) · [Report](#) · [... more](#)

Replying to [@MaloneyMarsha](#) and [@lani_esq](#)

We spoke to Lori Ann for **11 hours**. 2 witnesses on the line and wrote down everything she said. We reviewed her emails and quoted them. We drafted the declaration with her. We sent it to her and read every word with her and verified each sentence. She then signed it.

4 comments · 4 retweets · 55 likes

Ex. B

Lori Barnhart



@comcast.net

To Michael P. Brown

You replied to this message on 12/24/2020 3:38 PM.



12/24/2020

I understand you are representing Katherine Paulson I case 2:20-CV-01606-BJR. I am writing to you because the opposing counsel has been harassing people including me on twitter and has brought me up in the recent filings.

I have no knowledge of Tati. I watched Katie from her other content and I became outspoken because she has been harassed for way too long. Since I decided to stand up for her on occasion I've had an army of trolls after me trying to figure out who I am. I've been accused of being Katie herself and I've also been accused of trolling people. I haven't trolled, harassed or stalked anyone but I did stand up for myself and I've told people to leave me alone and if they didn't stop my family would protect me. I have screenshots where they have posted pics or other people with the name Lori with the threat of doxing me.

I have done nothing illegal here and this attorney took it upon himself to dox me with my full name Lori Ann Barnhart and listed the state where I live WA in his latest filing which has been reviewed on YouTube by numerous people. So now everyone thinks I am somehow involved. Sorry to go on and on I just don't want to know what I am being accused of, is there anything I can do, or should I try and just ignore it? My family is now on notice to watch for any strange requests they get online, including my 3 children. Thank you for your time. Lori Barnhart

From: Michael P. Brown

To: @comcast.net

Sent: December 24, 2020 at 3:38 PM

Subject: RE: Lori Barnhart

Hello Lori. What the Westbrooks did to you with this filing is shameful. The only “legitimate” point they could have been trying to make is that Katie has some connection to a person who lives in Washington. They could have done that without exposing your full name, or email address and phone number, or other background facts – all of that is totally irrelevant. It seems clear to me that the only purpose was to harass and intimidate you and anyone else who dares to say anything in support of Katie.

Unfortunately, I don’t know if there is much we can do about it, other than to bring it to the Court’s attention and object to it on your behalf. There is an attorney ethics rule saying a lawyer cannot use the legal system to harass or intimidate, and this filing seems to violate that rule. You can sign a statement that we can file, if you’d like, explaining what the filing has done to you and your family. You could also consider filing a complaint with the bar associations of Washington and California. That process moves very slowly, so it would not give you any quick relief.

Is there anything in there that is factually incorrect?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square

600 University Street, Suite 2915
Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162
www.gordontilden.com

Re: Lori Barnhart



@comcast.net

To Michael P. Brown



12/24/2020

| | | |
|---|---|---|
|  IMG_2110.PNG 45 KB |  IMG_2111.PNG 66 KB |  IMG_2112.PNG 70 KB |
|  IMG_2113.PNG 65 KB |  IMG_2114.PNG 71 KB |  IMG_2115.PNG 47 KB |
|  IMG_2116.PNG |  IMG_2117.PNG |  IMG_2118.PNG |

Just a sample of some of the harassment I don't want to inundate you. The first two are someone making a fake twitter account of me.

Re: Lori Barnhart



@comcast.net

To Michael P. Brown

Reply

Reply All

Forward

...

Thu 12/24/2020 5:10 PM

Katie has never asked me to do anything for her! We tweeted on occasion but she never instructed me to do anything nor would I. I still have no clue who Tati is.

I posted a link to Michael saltz's law firm because he was soliciting information on twitter. He didn't have a verified account and I would not want someone to send legal documents through twitter so that pissed him and his trolls off then they doxed me on twitter which he was apart of that thread. It is a big mess. Some of the information they put in the lawsuit is incorrect and I hope that other Lori isn't being harassed. Thank you for your time.

Re: Lori Barnhart



@comcast.net

To Michael P. Brown

Reply Reply All Forward ...

Thu 12/24/2020 5:41 PM

i You replied to this message on 12/25/2020 7:22 AM.

| | | | | | |
|--|---------------------------|--|-----------------------|--|-----------------------|
| | IMG_2118.PNG 315 bytes | | IMG_2119.PNG 48 KB | | IMG_2120.PNG 51 KB |
| | IMG_2121.PNG 59 KB | | IMG_2123.PNG 42 KB | | IMG_2122.PNG 68 KB |
| | IMG_2124.PNG | | IMG_2125.PNG | | |

Okay sorry I have a few more. Zag has also been doxed she is also someone that defends Katie she is an older woman in her 60's and they have been relentless. Also I am pretty sure a Emily Baker and Michael Saltz are or were colleagues at one time and the sock account imfcknrkn or whatever it is I think is working with them and has been since the beginning. She's insinuated she is in the past she also posted my dox. There is also a screenshot I found on reddit just by googling "Katie Joy Lori Ann" that says that I contacted people's family members I have done no such thing nor would I. Merry Christmas

Re: Lori Barnhart



a@comcast.net

To Michael P. Brown

Reply Reply All Forward ...

Fri 12/25/2020 7:48 PM

Please don't share this information

Hi again, I just read through those documents and they are doxing the wrong person. Some of it is my information but I've been retired for 10 years. I have worked for the federal government for 20 years but I've never worked for the WA DOL. I hope someone doesn't lose her job. I am going to try and contact her or her boss.

I have never had any interactions with Tati or her family. I've never tweeted anything at or about Tati. Isn't this about Tati and her harassment? What they have done here is terrible. They are spreading the declaration all over the internet youtube, twitter, etc. the information is not being blocked out. I will try and write something up and send it to you. Thank you Lori Barnhart

RE: Lori Barnhart



Michael P. Brown
To @comcast.net

Reply Reply All Forward ...
Fri 12/25/2020 7:22 AM

Good morning and Merry Christmas.

Have you seen an increase in harassment since the filing this week?

Michael P. Brown

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w: gordontilden.com



Lori



L B @gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Fri 12/25/2020 8:04 PM

Hi I am using this email it's much easier.

Yes it has amped up. I have been laying low my twitter is private and I have all kinds of trolls sending me follower requests.

I don't go out searching for stuff much because it just stresses me out and there isn't anything I can do. The creep posted this right before he filed those documents.

6:10 ↗ Today 4:02 AM Edit

Michael_Saltz @Michael... · 2d ...

Replying to @Yomama38156496

Is this the same person in the picture in those comments?



Lori



Lori A <mailto:lori.a@gmail.com>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Fri 12/25/2020 8:12 PM

You replied to this message on 12/26/2020 7:19 AM.

Sorry I'm not so good at email anymore. I think these are paid trolls by Tati. I have no proof on theories but these people have no feelings.

I think Emily and a few of the trolls work together. The imfcknrkn one has said she was an attorney on several occasions. I guess word on twitter is that they should be able to get a restraining order against me. 😞 They left out all the threats they have made against me and damn right my family will back me up. Funny I am not even a party in this case nor do I know anything about the Westbrook's but since they have money they don't seem to have to follow the rules. I am sure the person that works for the WA DOT comes into work on Monday to a bunch of hateful threats.

I've been going through and taking screenshots of stuff they aren't in order or anything. Lori

Re: Lori



Lori A <Lori.A...@gmail.com>
To Michael P. Brown

You replied to this message on 12/27/2020 9:20 AM.

Reply Reply All Forward ...

Sat 12/26/2020 9:44 PM

Hi Michael, yes that is true. I've never been in any legal trouble except then.

It was dismissed. I attached pics I hope you can see them.

Yes I would like to see what can be done since they are still going at it posting stuff about me. I can't even look at it. They want me to get mad and lash out.

[Screenshot omitted]

They aren't going to stop. I did send mr saltz some twitter dm's and informed him that he doxed the wrong person and asked him to stop bothering me. I told him I don't even know anything about Tati.

RE: Lori



Michael P. Brown
To Lori A

Reply Reply All Forward ...
Sun 12/27/2020 9:20 AM

Okay. I don't blame you for not looking at abusive stuff, but it would be good for you to preserve it somehow to show what this doxing has done to you.

BTW, I emailed the other Lori Barnhart to ask if she will contact me about this.

So your "crime" was damaging the cars of your cheating husband and his mistress?

Michael P. Brown

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w: gordontilden.com



REDACTED

RE: Lori



Michael P. Brown
To Sue M

Reply Reply All Forward ...
Wed 12/30/2020 5:56 PM

I spoke with Saltz today. They are planning to subpoena your Twitter account because they see that you closed your account and they think there might be evidence there about your connection to Katie. I did not disclose that you and I are in touch. Saltz even complained to me that you "threatened" him via DM.

Let me know if you want to talk about this.

Michael P. Brown

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RE: Lori



Michael P. Brown

To Sue M

Reply

Reply All

Forward

...

Wed 12/30/2020 6:22 PM

I'll have to think about this. For the time being, it's best for you not to make any contact with Katie (and vice-versa). They are working hard to try to paint you two as a "team" and that's not good for either of you.

Michael P. Brown

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w: gordontilden.com



Me



Sue M @gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Wed 12/30/2020 7:16 PM

You replied to this message on 12/31/2020 6:37 AM.

Maybe it would just be easier if I went and met with him myself. He can see me face to face and see I am no threat and I have nothing to hide. It would take pressure off of Katie and you and she won't be getting shit about me and Katie knows I have nothing to do with this. She has always discouraged harassment.

I actually present myself very well and know how to be professional when I need to be. Don't worry I will not say nor do anything without telling you first. Please know I don't talk to anyone in the community anymore. It's toxic and I've got enough issues. Sorry I keep messaging you!

RE: Me



Michael P. Brown
To Sue M

Reply Reply All Forward ...
Thu 12/31/2020 6:37 AM

I understand that impulse but you need to understand the type of person he is.

Do you have the ability to pay for your own lawyer to help you if they do issue a subpoena?

Michael P. Brown

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RE:



Michael P. Brown
To Sue M

Reply Reply All Forward ...
Thu 12/31/2020 2:47 PM

You'll get a copy of the subpoena if they issue it. If it just asks for communications with Katie then it sounds like there won't be much to it. If it is too broad (like asking for all your tweets etc) you can challenge it.

Michael P. Brown

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Re:



Sue M <Sue.M.Brown@gmail.com>
To Michael P. Brown

| | | | |
|-------|-----------|---------|-----|
| Reply | Reply All | Forward | ... |
|-------|-----------|---------|-----|

Thu 12/31/2020 5:03 PM

I won't cave to them and I won't turn on katie. She has done nothing wrong and I always expressed that I stand alone. I was standing up for what was right I am against bullying and harassment and I know that Katie is too. I stopped supporting her because of them and their constant harassment. Look what they have done to me and the other Lori this is exactly what bullies do. The laugh will be on them when they see I have done nothing. For all I care they can look at all my internet activities, they won't find anything. The only thing I wanted to keep private they have spread all over the internet . I am sure they will start bugging my landlord as well.

I will let you know if I receive anything from them. I am aware they are baiting both me and Katie. I have followed the instructions of law enforcement by getting off of those platforms. I still will stand up for myself, Katie, and my family meaning if the court deems me a threat then they can put me in jail or take my money (I have none). These people do what they are accusing me of doing tenfold.

I understand things are getting really intense right now and they will be filing another statement saying I threatened the creepy, stalking attorney. Let Katie know if you can that I will not be on twitter or YouTube at all. I won't be making any comments to make her life hell like it already is. Also let her know if you can that I am not in contact with anyone at all regarding this. I was close with a girl that goes by 'She turned on me (I am sure it was pressure from them) and I am pretty sure she is the one that led them to me. I always knew I was taking a risk and that is on me. Katie didn't cause any of this to happen to me.

I will work on writing something up just in case it is needed later on. It is just such a long, confusing story that is based on twitter, YouTube, and reality tv. Which is really stupid.

Sorry for wasting all of your time. I hope you can keep my information private.

Lori

(no subject)



Sue M <sue.m.brown@gmail.com>
To [Michael P. Brown](#)

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Thu 12/31/2020 5:28 PM

[You replied to this message on 1/4/2021 9:13 AM.](#)

Wouldn't they need to mail me a subpoena or go directly to twitter? I believe twitter will decide what to give them, not me. What exactly am I accused of? Don't I have to commit a crime? Or can I be wrongly accused, harassed and stalked only to find out I've done nothing?

RE:



Michael P. Brown
To Sue M

Reply Reply All Forward ...
Mon 1/4/2021 9:13 AM

You have not been accused of any crime or wrongdoing. They are just coming after you to build their case against Katie. If they subpoena you and Twitter, all you and Twitter will have to do is give them whatever communications you have had with Katie (which aren't many). You would get a copy of any subpoena before Twitter is allowed to hand over your information.

Can you speak briefly this morning?

Michael P. Brown

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RE: Lori



Michael P. Brown

To Sue M

Reply

Reply All

Forward

...

Mon 1/4/2021 5:56 PM



Dkt. 30-1 Saltz Supp Re Lori Ann.pdf
6 MB

Lori –

Saltz filed a long paper with the court today about your alleged connections with Katie. It's attached. Let me know if you can discuss.

Michael P. Brown

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Re: Lori



B Lori <lgolden@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 4:52 AM

I have no idea what to do. All I know is I haven't done anything I have no money for an attorney. I guess they can just hunt me down or subpoena the information from YouTube and everywhere else they have snooped.

On Mon, Jan 4, 2021 at 5:55 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

Lori –



This Tweet is unavailable.

EmilyDBaker | Lawyer | Commen... ⋮
@TheEmilyDBaker

Trying to fuck with lawyers on
twitter never goes well..... but I love
watching it unfold

2:39 PM · 11/4/20 · Twitter Web App

(no subject)



B Lori @gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Tue 1/5/2021 6:33 AM

You replied to this message on 1/5/2021 7:55 AM.

Did he have any repercussions for him and kim doxing the other person? They have made videos sharing this person's dox. In fact creepshow art did one. Will anything be put out so this woman's information will stop spreading like in all their underground Reddit groups? I hope I can keep my identity hidden I hope a judge sees what they do to innocent people. I shouldn't have to move and get a new phone and new emails because of this. I have three children and three grandkids as well that I am afraid for.

I sent some random screenshots they are not in order.

I made one comment about Emily, that is it! It is in the screenshots.

The guy I was complaining about Katie talking to has been horrible to me and to Katie he's made several videos.

I've attached screenshots of how salty has been going after other people on twitter as well. I have screenshots of reporting some tweets as they were harassing me.

I've been rude to him that is all I am guilty of. To be honest I didn't think he was an actual attorney representing someone in a 5 million dollar lawsuit and I thought someone might send him stuff and it wasn't really him.

This person seems to think she can go around doxing people and post private information about them. They also posted Katie's attorney information but if someone does it to them it's different.

I may send more screenshots.

RE:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 7:48 AM

What's the date and time of this one?

Tweets **Tweets & replies** Media Likes

Michael_Saltz @MichaelSalt... · 9m ...
Replying to @Bloodtall
@cuttingdawn333 and 4 others

My email has been posted a few times.
It is also on the section of the pleading
that you tweeted, along with my office
address and office phone number. My
invitation still stands. You can help us
collect more evidence throughout the
night. Bring food!

Michael P. Brown

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600 University Street, Suite 2915
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t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



RE:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 7:56 AM

I'm waiting to hear back from the lawyer for the other Lori still.

Would you be willing to file a statement that just says you're not that Lori and that your contact with KJ was limited to a few chats? You could also explain why you sent those tweets to Kim – it might be good to get your side of that story "out there."

Let me know if you can talk today.

Michael P. Brown

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t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: a draft feel free to make edits I couldn't figure out how to change the font



B Lori · gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 10:21 AM

I started watching Katie around November of 2019. I was following a tv show and I saw on a discussion page that she would be covering it. I had never watched much youtube, only when I had my grandsons over and they would sometimes watch kid shows. I didn't have a YouTube account until I started watching Katie. I got stuck in the YouTube drama so I started watching other creators as well. At first I didn't chat or interact much. I signed onto twitter around this time as well because you could following things more closely. I didn't have twitter until this all started. I found out quickly how vile social media really was.

Katie has been treated so horribly. It made me ill to see. I am older and I have older kids. As a mom I could not believe what I was experiencing. I reached out to her around April and I told her my life story. I did this because she was covering something that I could relate to. She said she was glad that I could open up to her. She never questioned me and I never questioned her. It was the only real conversation we had and it ended there.

On twitter people attacked and berated Katie every single day. They criticized everything about her her hair, forehead, chin, complexion, her child and whether or not he was handicapped, her child's looks, her husband, etc I mean everything.

Every tweet Katie made these accounts would berate her. After awhile I started to stand up for her. So then I began to be attacked on a regular basis. I was called a cunt, bitch, dumbass, stupid, you name it. I was accused of being Katie I was told I was just as bad as Katie.

The people that were after Katie made YouTube channels and their only goal was to torment her. One of these accounts was made by Kim Fulmer unveiling the masks. She made a video warning people to be aware of fake accounts. I made a comment on her video “Aren’t you yourself a fake account? So that sent her and her “group” after me. They made comments in response to me like “I see you”, “nice Facebook” (insinuating they found my private Facebook account), “I see you”, etc.

This behavior frightened me. I had seen what they were doing to Katie like taking pics of her home saying she wasn’t safe (name made by Tina Knight), calling the police to Katie’s home, the constant berating her, spamming her email, spamming her phone, etc. This honestly made me angry.

I was mad that these people could torment others and get away with it just to silence people. Their are no laws to stop this behavior and it has only gotten worse. This world we are bringing our kids into is a terrible place.

I got mad and said screw this they aren't going to scare me and frighten me. I made a tweet saying that I wasn't afraid and if they wanted to track me down then do it I have family that care about me. They were always taunting me and following me around on twitter and YouTube I see now they were trying to get a rise out of me and I fell for it. People would warn me that the account (not sure of spelling) was a lawyer and to be careful. I surely didn't believe that a professional attorney wouldn't be harassing, stalking, and posting private information on people online with a profile picture. She has been horrid.

There are so many twitter and YouTube trolls and sock accounts that would just follow me around because I supported Katie. I tried to reason with them, but there is no reasoning with them. All of the things that they are accusing me of THEY have been doing but instead of just one Katie supporter (me) they have many. I have heard that people actually get paid to do this, to torment others.

It got so bad that I stopped supporting Katie and all the trolls were my best friends. They wanted me to join their hate groups and troll Katie. When I refused to do that they started back in on harassing me again. People didn't want to associate with me because I stood up for myself. I asked others to not stand up for me because I didn't want what was happening to me to happen to them. No matter what I told these haters they would say I was lying. When I told them I was not member of some group that harassed Katie They still accused me of it and plenty more.

As far as Emily baker goes I've never communicated with her at all. I've never watched any of her videos and stay away from her twitter. I have made one comment in reference to her and it was in response to someone else's comment that said she no longer practiced law. I said I hope she tells people that and a lot of people like her content (I believe I made this comment in one of Katie's chats. Emily took that one tweet and made threats at me like "Don't fuck around with attorneys" She spread her threat and tweets about me all over the place. She's also talked very derogatory about me in her videos and she knows nothing about me. She shared someone else's dox and said it was me. It contained another Lori's work address, work phone number, work email, etc. many creators have now made similar videos spreading this other Lori's information for no other reason than to harass, stalk, embarrass me.

As far as saltzy goes he began making very inappropriate tweets. I personally found his twitter account to be suspect. He is representing someone that he claims is famous in a 5 million dollar lawsuit and he tweets out if anyone has any info on without a crystal ball Katie joy send it to him. It us so easy to pretend to be whomever you want to be on twitter. I've had people make fake accounts of me and saying awful things. I tweeted under his tweet a link to the attorney that was representing His client in case people did in fact want to send something in it would go to the right person. If I was anything, I was rude. I'm tired of this stuff happening to Katie. Then he began taunting me posting random pics of random people asking if it was me. He also allowed two people to dox me in the twitter thread posting more information about the Lori that they claimed was me. As soon as I tweeted to him all the sock accounts came running to harass me even more. I sent him a dm and told him that he doxed the wrong person hoping to do damage control and protect this person as much as I could. I posted on twitter that they had the wrong Lori and to not harass the woman but that seemed to add fuel to the fire. Instead of removing her information they just spread it around even more and made more vicious videos sharing this person's private information.

Katie has never, ever asked me to do anything for her. In fact she said just enjoy the content and ignore the trolls. She never would discuss things with me because she isn't able to trust anyone and for good reason. We have never spoke on the phone and she's never emailed me. The only communication that we have had was public on twitter and youtube that anyone could see. We would sometimes DM on twitter but not much at all. She doesn't know much of anything about me. I've never been in a discord with her. I was a paying member at one time for maybe 3 months. I was paying the lowest tier price.

I have never watched any of her Tati videos nor do I even know much of anything about Tati but her I am being accused of stalking and harassing this woman while she herself has people stalking and harassing me. It's pathetic.

I sent her superchats but rarely. The ones I sent on December 29, 2020 I sent because I am not a paying member to her channel so I couldn't talk in the chat. Yes I complained about salty harassing me and I complained about the man she was talking to during her live video because he is unstable and is very vicious he's made several videos that are absolutely horrid about katie, me, and others. I was worried about her trusting him.

It angers me that people can get away with so much and that I am being made out to be this awful person. I have worked for the federal government for 20 years. I am now retired. I've helped work on cases and never in my life seen people act so unprofessional surrounding this case.

Statement



B Lori <[REDACTED]@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 10:44 AM

Sorry it's been a long time since I've had to compose a letter. I used the wrong there and the format is all wonky.

Please edit as you see fit. If there are things you want me to add I can and remove anything that isn't needed. I didn't really go into how this has effected me. I also didn't add that I do not have a YouTube channel nor do I plan on ever making one. I'm simply a sub who was tired of seeing a woman to be berated every single day with no way to protect herself.

(no subject)



B Lori < B@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 11:06 AM

You replied to this message on 1/5/2021 11:15 AM.

I apologize for all the random emails. I am impulsive at times. If the judge won't let me hide my identity my ex husband (the father of my youngest) is willing to provide a statement about how I've been telling him to keep an eye on his social media along with his wife's and our sons and how I've been worried for all of our safety after seeing the lengths that these people go to and how he was worried about my son while he was home with me. I've done the same with my two older kids as well. These people have also drug people's children into things even posting pics of people's family members. Thanks again

RE:



Michael P. Brown
To B Lori

Reply Reply All Forward ...

Tue 1/5/2021 11:16 AM

Don't apologize. Can I call you at noon or after?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
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t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Kim's response (not in order)



B Loi

gmail.com>

To Michael F. Brown

Reply

Reply All

Forward

...

Tue 1/5/2021 11:21 AM

[Screenshots omitted]

Lori Ann
@Bloodtall

"Attorney" Michael Saltz and troll Kim Fulmer aka
unveiling the mask doxed someone that is not me.
Filing court docs next week. Leave the victim alone!

United States Joined November 2019

107 Following 18 Followers

Re:



B Lori <B.Lori.1990@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Tue 1/5/2021 11:22 AM

You replied to this message on 1/5/2021 3:23 PM.

Yes. I am going and look is at some more tweets. To be honest I don't look it makes me so frustrated. Especially since I haven't done anything wrong!

Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...

Tue 1/5/2021 12:09 PM

12:30 ok?

Get [Outlook for iOS](#)

RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 3:23 PM

Did you ever watch the videos etc. in which Katie says negative things about the Westbrooks?

Michael P. Brown

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Re: Re:



B Lori @gmail.com>
To Michael P. Brown

You replied to this message on 1/5/2021 3:40 PM.

Reply

Reply All

Forward

•••

Tue 1/5/2021 3:39 PM

I didn't watch any coverage on Tati. I didn't know who she or any of the other people involved were. A few months ago on twitter there was a video floating around on twitter of Tati. A lot of creators were covering it. I think someone was claiming the other ruined the other? I don't know the so called beauty community.

I don't recall her mentioning Tati at all in the videos that I watched.

RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 3:41 PM

That's what I thought. Thanks.

Michael P. Brown

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w: gordontilden.com



Re: Re:



B Lori < B.Lori@gmail.com>
To Michael P. Brown

You replied to this message on 1/5/2021 6:04 PM.

Reply Reply All Forward

Tue 1/5/2021 4:10 PM

Bingo!

The screenshot shows a social media post by a user with a profile picture of an octopus. The post text is: ★Unveiling... · Aug 18, 2020 · Replying to @Bloodtall · Thanks for your apology last night! The post has 9 likes and 1 comment. There are 'Log in' and 'Sign up' buttons at the top of the interface.

Log in Sign up

9

★Unveiling... · Aug 18, 2020 ·
Replying to @Bloodtall
Thanks for your apology last night!

1

RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 4:33 PM

Nice! I'll add it to the draft.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



RE: Re:



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Tue 1/5/2021 6:05 PM

Thinking about this more, it might be difficult for you to file this declaration on your own (rather than through me) since you are not a party in the lawsuit. Katie is okay with having me file it. Let me know if that works for you.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Re:



B Lori <B.Lori@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 6:06 PM

You replied to this message on 1/5/2021 7:49 PM.

I'm fine with that. I contacted you because of the doxing of the wrong Lori, so that's how it started anyway.

Re: Re:



B Lori >gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Tue 1/5/2021 8:09 PM

You replied to this message on 1/5/2021 8:30 PM.

Yes, I will be. Do you know about what time? I will be around all day I just want to make sure I am awake sometimes I sleep late.

Re: Re:



B Lori <mail.com>
To Michael P. Brown

You replied to this message on 1/6/2021 10:31 AM.

Reply Reply All Forward

Tue 1/5/2021 8:11 PM

Actually whenever is fine I will just turn my alerts on.

RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Tue 1/5/2021 8:31 PM

It will be late morning I think.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 10:32 AM

Good morning. You've probably already answered this but do you have the tweet that you were responding to here?

[Screenshot omitted]

What date did you sent this on?



Michael P. Brown
To: B Lori

Reply Reply All Forward ...
Wed 1/6/2021 10:58 AM



Re: What date did you sent this on?



B Lori mail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 11:31 AM

It was the same day I sent the other ones to him. He didn't include it.

(no subject)



B Lori < B.Lori@gmail.com>
To Michael P. Brown

Reply Reply All Forward

Wed 1/6/2021 12:52 PM

You replied to this message on 1/6/2021 1:32 PM.

Did you see the tweet he did saying I was being added to the witness list or something? He's been tweeting about me or was. I haven't looked to hard makes me ill

RE:



Michael P. Brown
To B Lori

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Wed 1/6/2021 1:33 PM

Barnhart Decl.docx
90 KB

Yeah he threatened to add you to the lawsuit. It's ridiculous. You hurt his feelings.

Here's a draft declaration for you to review. Let me know if you see anything that looks incorrect (don't assume that I have the story right!).

We can talk about what to add, delete, or change.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

17 TATIANA WESTBROOK, an individual;
18 JAMES WESTBROOK, an individual;
19 HALO BEAUTY PARTNERS, LLC, a
20 Nevada Limited Liability Company,

NO. 2:20-cv-01606 BJR

**DECLARATION OF LORI ANN
BARNHART**

Plaintiffs

v.

25
26 KATIE JOY PAULSON, an individual;
27 WITHOUT A CRYSTAL BALL, LLC, a
28 Minnesota Limited Liability Company; and
29 DOES 1 through 100, inclusive.

Defendants

Katherine Paulson declares as follows:

41 2. On or about Christmas Eve, December 24, 2020, I learned that I was the subject
42
43 of a declaration filed in this lawsuit by Kimberly Fulmer. *See* Dkt. 27-3. I was surprised because
44
45 I was not involved in this lawsuit or with any dispute between Ms. Paulson and the Westbrooks.

DECLARATION OF LORI ANN BARNHART - 1

GORDON 600 University Street
TILDEN Suite 2915
THOMAS Seattle, WA 98101
CORDELL 206.467.6477

1 other than the fact that I had posted a few comments on social media in defense of her when I felt
 2 she was being unfairly treated by the Westbrooks' attorney Mr. Saltz and by others who were
 3 "following" his tweets in which he criticized Ms. Paulson and discussed the case. Mr. Saltz and I
 4 have exchanged several heated tweets since November of 2020.
 5

6 3. My surprise turned to shock when I learned that Kim Fulmer's declaration
 7 included a reference to and a copy of a criminal charge brought against me in 2012. That eight -
 8 year-old incident has nothing to do with the Westbrooks or Ms. Paulson. I also saw that the
 9 declaration did not mention the important fact that this charge was subsequently dismissed, at the
 10 request of the prosecutor. I am attaching as Exhibit ___ a copy of that order of dismissal. This
 11 incident came at a very difficult time in my life, and it did not involve harm or a threat of harm
 12 on any person. It is the only time in my life I have been accused of any crime.
 13

14 4. It was and is very upsetting to see this old information made public, in a lawsuit
 15 in which I am not involved, and for no apparent reason other than to embarrass and intimidate
 16 me and others who might offend Mr. Saltz or speak out in defense of Ms. Paulson. I do not
 17 understand how Ms. Fulmer or the Westbrooks' attorneys believed this information from 2012 is
 18 relevant to the lawsuit.
 19

20 5. I also noticed that Plaintiffs included what they believed to be my Washington
 21 Department of Transportation work phone number (direct line) and email address in their
 22 declaration. In fact, I do not work for the WDOT and I have never worked for that agency. In
 23 fact, I have been retired from work for ___ years. It appears that Ms. Fulmer and the Westbrooks
 24 disclosed the contact information for a different Lori Barnhart, who does work for WDOT.
 25 Although this part of the disclosure did not affect me (because it is not my contact information), I
 26 was very troubled that the Westbrooks would include the entire telephone number and email
 27

28 DECLARATION OF LORI ANN BARNHART - 2

| | |
|---------|-----------------------|
| GORDON | 600 University Street |
| TILDEN | Suite 2915 |
| THOMAS | Seattle, WA 98101 |
| CORDELL | 206.467.6477 |

1 address for the person they believed to me, when that disclosure was totally unnecessary to show
 2 that “Lori Barnhart” worked for WDOT. It would have been very simple to redact enough of the
 3 information to show the “Washington” area code and/or the WDOT email address, without
 4 disclosing the entire entry. I believe the Westbrooks and their attorneys and Ms. Fulmer made
 5 this unnecessary disclosure in an attempt to further harass and intimidate me, and others. It is not
 6 difficult to imagine how disclosing an old criminal charge in the same document as employer
 7 information and contact numbers, could result in embarrassment or worse.
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15 6. I informed Mr. Saltz on December ____ that he had disclosed the phone number
 16 and email address of the wrong person. I am attaching a copy of that tweet, sent to Mr. Saltz’s
 17 public Twitter account, on _____. *See Exhibit ____.* He never asked me for more information on that
 18 subject, although the screenshots attached at Exhibit ____ show that his Twitter followers made
 19 jokes about him “doxing” the wrong person.
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25 7. I was also shocked to read that Ms. Fulmer included in her declaration screenshots
 26 of tweets I sent to her, in response to harassment I received online from her and her associates. I
 27 attach as Exhibit ____ just some of the vile messages I received from them and to which I was
 28 responding. The harassment frightened me, and I attempted to defend myself by stating that I
 29 had relatives and friends who would protect me *if* I was attacked at my home.
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35 8. After sending those messages, I regretted them and extended an apology to Ms.
 36 Fulmer in August of 2020. She responded with an enthusiastic “Thank you for the apology!” and
 37 we had friendly interactions after that. In light of this, I find it unbelievable that Ms. Fulmer
 38 would state in a sworn declaration that she currently “fears for her life.”
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[Remainder of this page intentionally left blank – signature on following page]

DECLARATION OF LORI ANN BARNHART - 3

| | |
|--------|-----------------------|
| GORDON | 600 University Street |
| TILDEN | Suite 2915 |
| THOMAS | Seattle, WA 98101 |

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13 I declare pursuant to the laws of perjury of the State of Washington that foregoing is true
14 and correct.

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DATED this 6th day of January, 2021 at _____, Washington

Katherine Paulson

DECLARATION OF LORI ANN BARNHART - 4

GORDON
TILDEN
THOMAS
CORDELL | 600 University Street
Suite 2915
Seattle, WA 98101
206.467.6477

PDF Focus

Re:



B Lori >gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 1:40 PM

You replied to this message on 1/6/2021 1:43 PM.

Looks good. Maybe add that they also included her work address, the general phone number of the agency and her direct phone line. Also it says it is Katie's declaration and has her name at the bottom. Thank you!

On Wed, Jan 6, 2021 at 1:33 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

Yeah he threatened to add you to the lawsuit. It's ridiculous. You hurt his feelings.

Here's a draft declaration for you to review. Let me know if you see anything that looks incorrect (don't assume that I have the story right!).

We can talk about what to add, delete, or change.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com

RE: Re:



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 1:44 PM

Great. I'm trying to figure out what we can say about the harassment you've received as a result of the Fulmer declaration. Should we say you've taken down your accounts because of it?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Re:



B Lori @gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 1:56 PM

Yes. I've been harassed since then. Kim and I even had exchanged friendly DM's after I apologized and she accepted my apology. They (this group) then turned on me when I would not participate in the harassment of Katie when I said I couldn't support her anymore. The heat I was getting was too much for me. Should we add that the declaration has been shared all over twitter and YouTube? Some large channels have done videos on it as well and shared close up pictures of the private information? I guess the Attorney General hasn't responded yet?

On Wed, Jan 6, 2021 at 1:43 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

Great. I'm trying to figure out what we can say about the harassment you've received as a result of the Fulmer declaration. Should we say you've taken down your accounts because of it?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Twitter



B Lor mail.com>
To Michael P. Brown

Reply Reply All Forward ...

Wed 1/6/2021 2:05 PM

You replied to this message on 1/6/2021 2:06 PM.

Basically that was the straw that broke the camels back. When I called the police non emergency line to see if they had any advice on what I could do about the other Lori to try and somehow protect her they told me I should close my social media accounts since people that do things like this can get out of hand. They purposely did that late Christmas Eve because they knew nothing could be done about it until the following Monday. They laughed and said merry Christmas.

RE: Twitter



Michael P. Brown
To: B Lori

Reply Reply All Forward ...
Wed 1/6/2021 2:07 PM

Okay. The Christmas Eve timing of this is especially nice, right?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Twitter



B Lori jmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 2:13 PM

Yep Emily had a great time streaming it too. She did a stream on Christmas Eve and then did another one when he filed that 17 page document. One video had 133k views the other had 56k and that was just her videos. Several others were done too. One had 1.3k comments the other had 390. I couldn't stomach looking at the comments.

[Screenshots omitted]

Re: Twitter



B Lori <mailto:b.lori@gmail.com>

To Michael P. Brown

You replied to this message on 1/6/2021 2:29 PM.

Reply Reply All Forward

Wed 1/6/2021 2:21 PM

These two did videos on it as well and showed close up pics of the documents. These are just the ones that I know of. I didn't watch them but I scrolled through and saw the docs. 188k views and 6.6k views.

Re: Twitter



B Lori gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 2:26 PM

Even though I notified him that he had the wrong information he has continued with this and even filed the 17 page document. He has not corrected his error since.

RE: Twitter



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 2:29 PM

Thanks. How long have you been retired?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Twitter



B Lori

To: Michael F. Brown

nail.com>

Reply

Reply All

Forward

...

Wed 1/6/2021 2:30 PM

(i) You replied to this message on 1/6/2021 3:19 PM.

10 years. I worked for 32 years the last 20 were with the agency since I did say that so they don't accuse me of lying.

) maybe we could say with a federal

RE: Twitter



Michael P. Brown
To B Lori

Reply Reply All Forward ...

Wed 1/6/2021 3:19 PM



I added a lot of stuff so please read it carefully and let me know what we should change.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual;
HALO BEAUTY PARTNERS, LLC, a
Nevada Limited Liability Company,

Plaintiffs,

V.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606 BJR

**DECLARATION OF LORI ANN
BARNHART**

Katherine Paulson declares as follows.

1. I am over the age of 18 and am not a party to this action. I make this declaration based on personal knowledge.

2. I do not make this declaration because I support Defendants with respect to the claims in this lawsuit. I have no basis to judge those legal claims and I have had no interest in the Westbrooks before or after this lawsuit began. I make this declaration because I would like the

DECLARATION OF LORI ANN BARNHART - 1

GORDON 600 University Street
TILDEN Suite 2915
THOMAS Seattle, WA 98101
CORDELL 206.467.6477

1 Court to be aware that the Plaintiffs and their attorneys filed a declaration on December 23, 2020
 2 in this matter that included very personal information about me that is totally unrelated to this
 3 lawsuit. Based on my history of Twitter interactions with the Westbrooks' attorney, I believe this
 4 was done to follow through on a threat their attorney publicly directed at me in November 2020.
 5
 6 I will explain further below.

7
 8 3. On or about Christmas Eve, December 24, 2020, I learned that I was the subject
 9 of a declaration filed by Kimberly Fulmer in this lawsuit on behalf of Plaintiffs, close to
 10 midnight on December 23rd. *See Dkt. 27-3.* I was surprised because I was not involved in this
 11 lawsuit or with any dispute between Ms. Paulson and the Westbrooks, other than the fact that I
 12 had posted a few comments on social media in defense of her, when I felt she was being unfairly
 13 treated by the Westbrooks' attorney Mr. Michael Saltz and by others who were "following" his
 14 tweets, in which he criticized Ms. Paulson and discussed the case. Mr. Saltz and I have
 15 exchanged several tweets since November of 2020. In a November tweet, Mr. Saltz publicly
 16 threatened to make me a defendant in this case, despite having no reason to believe I did
 17 anything unlawful toward his clients. A copy of that tweet is attached as Exhibit _____. Around
 18 that same time he made a similar public threat on Twitter toward another person who said
 19 something on Twitter that he didn't like. In that case he stated that he would turn his
 20 "prosecutorial attention" towards the woman who sent that tweet (the tweet that prompted that
 21 threat simply asked that he confirm that he was the Westbrooks' attorney). A copy of that
 22 exchange is attached as Exhibit _____.
 23
 24

25 4. My surprise turned to shock when I learned that Kim Fulmer's declaration
 26 included a reference to, and a copy of, a criminal charge brought against me in 2012. That eight -
 27 year-old incident has nothing to do with the Westbrooks or Ms. Paulson. I also saw that the
 28 declaration did not mention the important fact that this charge was subsequently dismissed, at the
 29 request of the prosecutor. I am attaching as Exhibit ____ a copy of that order of dismissal. This
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DECLARATION OF LORI ANN BARNHART - 2

| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 incident came at a very difficult time in my life, and it did not involve harm or a threat of harm
 2 on any person. It is the only time in my life I have been accused of any crime.
 3

4 5. It was and is very upsetting to see this old information made public, in a lawsuit
 5 in which I am not involved, and for no apparent reason other than to embarrass and intimidate
 6 me and others who might offend Mr. Saltz or speak out in defense of Ms. Paulson. I do not
 7 understand how Ms. Fulmer or Mr. Saltz believed this information from 2012 is relevant to the
 8 lawsuit. I believe this filing was the punishment Mr. Saltz promised to inflict on me in November
 9 of 2020. He found no basis to follow through on his threat to make me a defendant, so instead he
 10 chose to use the legal system in another way to embarrass, harass, and intimidate me and others.
 11

12 6. I also noticed that Plaintiffs included what they believed to be my Washington
 13 Department of Transportation work phone number (direct line) and email and physical address in
 14 their declaration. In fact, I do not work for the WDOT and I have never worked for that agency. I
 15 have been retired from work for 10 years after working 20 years for a federal agency. It appears
 16 that Ms. Fulmer and Plaintiffs disclosed the contact information for a different Lori Barnhart,
 17 who does work for WDOT. Although this part of the disclosure did not affect me (because it is
 18 not my contact information), I was very troubled that they would include the entire telephone
 19 number and email address (and work address) for the person they believed to be me, when that
 20 disclosure was totally unnecessary to show that "I" worked for WDOT. It would have been very
 21 simple to redact enough of the information to show the "Washington" area code and/or the
 22 WDOT email address, without disclosing the entire entry. I believe the Westbrooks, their
 23 attorneys, and Ms. Fulmer made this unnecessary disclosure ~~in an attempt~~ to further harass and
 24 intimidate me, and others.
 25

26 7. Since the filing of this declaration, its contents have been broadcast to an
 27 enormous audience of people following this case on social media, most of whom are fans of Tati
 28 Westbrook. Below is a link to one such video in which the pages of the declaration and exhibits
 29 are clearly shown and discussed, to an audience of at least 130,000 people. Plaintiffs ~~were well~~
 30

31 DECLARATION OF LORI ANN BARNHART - 3

| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 aware that their December 23rd filing would be broadcast widely on social media, because other
 2 filings have received that much attention.
 3

4 8. I informed Mr. Saltz on December ____ that he had disclosed the phone number
 5 and email address of the wrong person. I am attaching a copy of that tweet, sent to Mr. ~~Saltz's~~
 6 public Twitter account, on _____. See Exhibit ___. He never asked me for more information on that
 7 subject, although the screenshots attached at Exhibit ____ show that his Twitter followers made
 8 jokes about him exposing the private contact information of the wrong person, and appeared to
 9 find it entertaining.
 10

11 9. I was also surprised to read that Ms. Fulmer included in her declaration
 12 screenshots of tweets I sent to her, in response to harassment I received online from her and her
 13 associates. I attach as Exhibit ____ just some of the vile messages I received from them and to
 14 which I was responding. The harassment frightened me, and I attempted to defend myself by
 15 stating that I had relatives and friends who would protect me if I was attacked at my home.
 16

17 10. After sending those messages, I regretted them and extended an apology to Ms.
 18 Fulmer in August of 2020. She responded with an enthusiastic "Thank you for the apology!" and
 19 we had friendly interactions after that. In light of this, I find it unbelievable that Ms. Fulmer
 20 would state in a sworn declaration that in late December 2020 she "fears for her life" because of
 21 tweets from eight months ago. To my knowledge, she has never done anything about this alleged
 22 "fear" before filing this declaration.
 23

24 11. My interactions with Ms. Paulson have been limited to: (1) a few brief online
 25 conversations unrelated to this matter; (2) the fact that I was a subscriber to her channel for a
 26 brief time in _____, 2020; and (3) the fact that last week I sent her a few "chats" (after the filing
 27 of the Fulmer Declaration). Because I was no longer a subscriber, I paid for each of those chats
 28 separately, for a total of \$ _____. Ms. Paulson and I have never been friends and have had very
 29 little direct contact. I have not done anything to coordinate with her to "hide evidence" or do
 30 anything unlawful, nor do I have any reason to believe she would want me to do so. I have no
 31
 32

33 DECLARATION OF LORI ANN BARNHART - 4

| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 reason to believe Ms. Paulson knew what state I lived in until very recently. I understand she
2 might have referred to me as “her best friend” when I sent a comment during one of her videos.
3 This was obviously not meant literally, based on the very limited nature of my interactions with
4 Ms. Paulson. I believe Ms. Paulson made that comment in reference to the fact that I had at one
5 time been critical of her online but had changed my mind and had sent a few messages in support
6 of her. Against that backdrop, she said something to the effect of: “Lori used to not like me but
7 now she’s my best friend.” I believe it’s called hyperbole.

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13 I declare pursuant to the laws of perjury of the State of Washington that foregoing is true
14 and correct.

15
16 DATED this 6th day of January, 2021 at _____, Washington

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20 Lori Ann Barnhart

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45 DECLARATION OF LORI ANN BARNHART - 5

GORDON | 600 University Street
TILDEN Suite 2915
THOMAS Seattle, WA 98101
CORDELL 206.467.6477

Membership



B Lori gmail.com>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Wed 1/6/2021 4:15 PM

I was a member to her channel for 8 months from January of 2020 until August 2020 at 3.99 per month. With tax the total would be \$33.60. I'm trying to find the super chats I have made to her. I'm sure the total isn't more than 50.00 including the three that I sent. I'm having a hard time finding them on my bank account. One was 14.99, one was 4.99, and the third was around 3.99. I could be off a dollar or two.

Re: Membership



B Lo gmail.com>
To Michael P. Brown

(i) You replied to this message on 1/6/2021 5:03 PM.

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Wed 1/6/2021 4:30 PM

Here the three are.

| DEC 29, 2020 | MT10WTMT7V |
|---|---------------------|
|  YouTube: Watch, Listen, Stream, Super Chat Google LLC In-App Purchase | \$4.99 |
|  YouTube: Watch, Listen, Stream, Super Chat Google LLC In-App Purchase | \$4.99 |
|  YouTube: Watch, Listen, Stream, Super Chat Google LLC In-App Purchase | \$14.99 |
| Total Billed | \$27.29 > |

RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 5:03 PM

Are you able to sign something this evening and scan it back to me? Do you have a scanner?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Membership



B Lori gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 5:04 PM

I don't have a scanner.

Re: Membership



B Lc @gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Wed 1/6/2021 5:05 PM

You replied to this message on 1/6/2021 5:48 PM.

If I sign it and send it to someone else to scan would that work?

Re: Membership



B Lori gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 5:07 PM

I am sure there is a place I can scan it from close to me I live right in town.

Re: Membership



B Lori
To Michael P. Brown

gmail.com>

Reply Reply All Forward ...

Wed 1/6/2021 5:19 PM

You replied to this message on 1/6/2021 5:44 PM.

They do have scanner apps on my iPhone. I've been able to cash checks that way before

RE: Membership



Michael P. Brown

To B Lori

Reply

Reply All

Forward

...

Wed 1/6/2021 5:45 PM

Great. Will you be able to review a final version in an hour or so?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: Membership



B Lori gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 5:45 PM

Yes, I can.

RE: Membership



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Wed 1/6/2021 5:49 PM

How would you send it to them to scan?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: Membership



B Lo
To Michael P. Brown

gmail.com>

You replied to this message on 1/6/2021 6:00 PM.

Reply Reply All Forward

Wed 1/6/2021 5:58 PM

I was thinking email but that doesn't make sense lol

RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 6:00 PM

Join the club.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Membership



B Lori >@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 6:16 PM

You replied to this message on 1/6/2021 6:18 PM.

Did you send the one for me to sign?

RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...

Wed 1/6/2021 6:18 PM

Barnhart Decl.docx
92 KB

No. Here it is. I made the signature page a separate page so you don't need to re-sign if we need to make tweaks. Of course I will not make any changes without you reviewing them.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



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The Honorable Barbara J. Rothstein

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

17
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21

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual;
HALO BEAUTY PARTNERS, LLC, a
Nevada Limited Liability Company,

22
23

Plaintiffs,

24
25

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

30
31
32

Defendants.

33
34

35 Lori Ann Barnhart declares as follows:

36

37 1. I am over the age of 18 and am not a party to this action. I make this declaration
38 based on personal knowledge.

39

40 2. I do not make this declaration because I support Defendants with respect to the
41 claims in this lawsuit. I have no basis to judge those legal claims and I have had no interest in the
42 Westbrooks before or after this lawsuit began. I make this declaration only to clear up
43
44

45

DECLARATION OF LORI ANN BARNHART - 1

GORDON
TILDEN
THOMAS
CORDELL

600 University Street
Suite 2915
Seattle, WA 98101
206.467.6477

1 misstatements of facts, and because I would like the Court to be aware that the Plaintiffs filed a
 2 declaration on December 23, 2020 in this matter that in my opinion inappropriately included
 3 very personal information about me that is totally unrelated to this lawsuit. Based on my history
 4 of Twitter interactions with the Westbrooks' attorney, Michael Saltz, I believe this was done to
 5 follow through on a public threat he directed at me via Twitter in November 2020. I will explain
 6 further below.

7 3. Mr. Saltz and I have exchanged several tweets since November of 2020 related to
 8 this case. In a November tweet, Mr. Saltz became angry at me when I suggested he was not the
 9 Westbrooks' real attorney, because I had believed that attorneys are not supposed to discuss their
 10 cases on social media. Mr. Saltz responded by publicly threatening to make me a defendant in
 11 this case, despite having no reason to believe I did anything unlawful toward his clients. A copy
 12 of that tweet is attached as **Exhibit A**. Around that same time he made a similar public threat on
 13 Twitter toward another person who said something on Twitter that he didn't like. While my
 14 tweet in response to Mr. Saltz was admittedly rudely stated, this Twitter user simply asked him,
 15 mildly, to confirm he was the Westbrooks' lawyer. He angrily responded by threatening to turn
 16 his "prosecutorial attention" towards her. A copy of that exchange is attached as **Exhibit B**.

17 4. On or about Christmas Eve, December 24, 2020, I learned that I was the subject
 18 of a declaration filed by Kimberly Fulmer in this lawsuit on behalf of Plaintiffs, close to
 19 midnight on December 23rd. *See Dkt. 27-3.* I was surprised because my involvement with this
 20 lawsuit was limited to observing social media related to it, and posting some comments myself in
 21 defense of Ms. Paulson, when I felt she was being unfairly treated.

22 5. My surprise turned to shock when I learned that Kim Fulmer's declaration
 23 included a reference to, and a copy of, a criminal charge brought against me in 2012. That eight -
 24 year-old incident has nothing to do with the Westbrooks or Ms. Paulson. I also saw that the
 25 declaration did not mention the important fact that this charge was subsequently dismissed, at the
 26 request of the prosecutor. I am attaching as **Exhibit C** a copy of that order of dismissal. This

27 DECLARATION OF LORI ANN BARNHART - 2

| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 2012 incident came at a very difficult time in my life, and it did not involve harm or a threat of
 2 harm on any person. It is the only time in my life I have been accused of any crime.
 3

4 6. It was and still is very upsetting to see this old information made public, in a
 5 lawsuit in which I am not involved, and for no apparent reason other than to embarrass and
 6 intimidate me and others who might offend Mr. Saltz or speak out in defense of Ms. Paulson. I
 7 I do not understand how Ms. Fulmer or Mr. Saltz believed this information from 2012 is relevant
 8 to the lawsuit. I believe this filing was the punishment Mr. Saltz promised to inflict on me in
 9 November of 2020. He found no basis to follow through on his threat to make me a defendant, so
 10 so instead he chose to use this filing to embarrass, harass, and intimidate me and others.
 11

12 7. I also noticed that Plaintiffs included what they believed to be my Washington
 13 Department of Transportation work phone number (direct line), email, and physical address in
 14 their declaration. In fact, I do not work for the WDOT and I have never worked for that agency. I
 15 I have been retired from work for 10 years after working 20 years for a federal agency. It appears
 16 that Ms. Fulmer and Plaintiffs disclosed the contact information for a different Lori Barnhart,
 17 who does work for WDOT. Although this part of the disclosure did not affect me (because it is
 18 not my contact information), I was very troubled that they would include the entire telephone
 19 number and email address (and work address) for the person they believed to be me, when that
 20 disclosure was totally unnecessary to show that "I" worked for WDOT. It would have been very
 21 simple to redact enough of the information to show the "Washington" area code and/or the
 22 WDOT email address, without disclosing the entire entry. I believe the Westbrooks, their
 23 attorneys, and Ms. Fulmer made this unnecessary disclosure in an attempt to further harass and
 24 intimidate me, and others.
 25

26 8. Since the filing of this declaration, its contents have been broadcast to an
 27 enormous audience of more than 130,000 people following this case on social media, most of
 28 whom appear to be fans of Tati Westbrook and/or people who enjoy abusing Ms. Paulson. Below
 29 is a link to one such video. Plaintiffs were well aware that their December 23rd filing would be
 30 31 32 33 34 35 36 37 38

39 DECLARATION OF LORI ANN BARNHART - 3
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| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 broadcast widely on social media, because other filings have received that much attention and
 2 because their attorney communicates with that YouTube personality via Twitter.
 3

4 <https://www.youtube.com/watch?v=FHiorAfp0oE>
 5

6

7 9. I informed Mr. Saltz shortly after the filing of the Fulmer declaration that he had
 8 “doxed” (disclosed the phone number and email address of) the wrong person. I am attaching a
 9 copy of that tweet. *See Exhibit D.* He never asked me for more information on that subject.,
 10 although the screenshots attached at Exhibit ____ show that his Twitter followers made jokes
 11 about him exposing the private contact information of the wrong person, and appeared to find it
 12 entertaining.
 13

14

15 10. I was also surprised to read that Ms. Fulmer included in her declaration
 16 screenshots of tweets I sent to her, in response to harassment I received online from her and her
 17 associates. I attach as Exhibit ____ just some of the vile messages I received from them and to
 18 which I was responding. The harassment frightened me, and I attempted to defend myself by
 19 stating that I had relatives and friends who would protect me if I was attacked at my home.
 20

21

22 11. After sending those messages, I regretted them and extended an apology to Ms.
 23 Fulmer in August of 2020. She responded with an enthusiastic “Thank you for the apology!” and
 24 we had friendly interactions after that. *In light of* this, I find it unbelievable that Ms. Fulmer
 25 would state in a sworn declaration that in late December 2020 she “fears for her life” because of
 26 tweets from eight months ago. To my knowledge, she has never done anything about this alleged
 27 “fear” before filing this declaration.
 28

29

30 12. My interactions with Ms. Paulson have been limited to: (1) a few brief online
 31 conversations unrelated to this matter; (2) the fact that I was a subscriber to her channel (for
 32 \$3.99 per month) from January 2020 until August 2020; and (3) the fact that last week I sent her
 33 a few “chats” after the filing of the Fulmer Declaration (for a total of \$24.97). Ms. Paulson and I
 34 have never been friends and have had very little direct contact. I have not done anything to
 35 coordinate with her to “hide evidence” or do anything unlawful, nor do I have any reason to
 36

37 DECLARATION OF LORI ANN BARNHART - 4

| | |
|---|--|
| GORDON TILDEN THOMAS CORDELL | 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 |
|---|--|

1 believe she would want me to do so. I have no reason to believe Ms. Paulson knew what state I
2 lived in until very recently. I understand she might have referred to me as “her best friend” when
3 I sent a comment during one of her videos. This was obviously not meant literally, based on the
4 very limited nature of my interactions with Ms. Paulson. I believe Ms. Paulson made that
5 comment in reference to the fact that I had at one time been critical of her online but had
6 changed my mind and had sent a few messages in support of her. Against that backdrop, she said
7 something to the effect of: “Lori used to not like me but now she’s my best friend.” I took it as
8 12 lighthearted hyperbole.
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DECLARATION OF LORI ANN BARNHART - 5

GORDON
TILDEN
THOMAS
CORDELL | 600 University Street
Suite 2915
Seattle, WA 98101
206.467.6477

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I declare pursuant to the laws of perjury of the State of Washington that foregoing is true
and correct.

DATED this 6th day of January, 2021 at _____, Washington

Lori Ann Barnhart

DECLARATION OF LORI ANN BARNHART - 6

GORDON | 600 University Street
TILDEN Suite 2915
THOMAS Seattle, WA 98101
CORDELL 206.467.6477

Re: Membership



B Lori >@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 6:20 PM

You replied to this message on 1/6/2021 6:29 PM.

I don't have a printer can I use one of those signature apps?

RE: Membership



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Wed 1/6/2021 6:22 PM

I'm not sure how they work. Do you know?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 6:29 PM

I'm thinking we might want to hold off and file this separately a little later (not tonight), to give us a chance to digest and respond to the new craziness in Saltz's most recent filing on Monday.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Membership



B Lo mail.com>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Wed 1/6/2021 6:27 PM

It's an app you download and you sign the document and email them back. I've used them for doctor's and my bank will accept them for paper checks I don't know if the court will though

On Wed, Jan 6, 2021 at 6:22 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

I'm not sure how they work. Do you know?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

[600 University Street](http://600UniversityStreet.com), Suite 2915

[Seattle, Washington 98101](http://SeattleWashington98101.com)

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: Membership



B Lori Lori.Brown@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 6:29 PM

I have a printer it is out of ink I will go over to the store and get some ink for it.

Re: Membership



B Lo
To Michael P. Brown
gmail.com>

Reply Reply All Forward ...
Wed 1/6/2021 6:31 PM

You replied to this message on 1/6/2021 7:04 PM.

Okay whatever you want to do Walmart is just 10 minutes from me and I don't work so I'm up all night.

On Wed, Jan 6, 2021 at 6:29 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

I'm thinking we might want to hold off and file this separately a little later (not tonight), to give us a chance to digest and respond to the new craziness in Saltz's most recent filing on Monday.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

[600 University Street, Suite 2915](http://600UniversityStreet.com)

[Seattle, Washington 98101](http://SeattleWashington98101.com)

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: Membership



B Loi nail.com>
To Michael P. Brown

You replied to this message on 1/6/2021 6:44 PM.

Reply Reply All Forward ...

Wed 1/6/2021 6:33 PM

Will I need legal size paper?

RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 6:45 PM

No just normal.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 7:05 PM

I appreciate that very much. As I look at Saltz's newest filing more I think I need more time to digest it and craft one response that deals with all of it. It's just lunacy the way he acts like he's broken open some conspiracy between you and Katie to suppress evidence (evidence that would be totally irrelevant if it existed).

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Membership



B Lo i@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Wed 1/6/2021 7:08 PM

You replied to this message on 1/6/2021 7:24 PM.

He is making an example out of me. Someone tried to stick up for me the other day on twitter and they were attacked. Watch he will get a mass amount of people to write statements that I harassed them. 😞. He's making sure no one will step forward for Katie and if they do they will have all their private information exposed.

On Wed, Jan 6, 2021 at 7:04 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

I appreciate that very much. As I look at Saltz's newest filing more I think I need more time to digest it and craft one response that deals with all of it. It's just lunacy the way he acts like he's broken open some conspiracy between you and Katie to suppress evidence (evidence that would be totally irrelevant if it existed).

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



RE: Membership



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Wed 1/6/2021 7:24 PM

Yep.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Super chats



B Lori >gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Thu 1/7/2021 1:42 AM

I wanted to let you know that when you are a member of a channel you can still send super chats. I guess they are like tips. In the last year I've probably sent M Katie about \$50 in super chats, not including the three that totaled the \$2700. I have receipts from YouTube but they don't show who I sent the super chats to. I sent some to another channel "Unirock" The receipts add up to approximately \$130 (not including the 3). This was over a year's time.

One more thing



B Lor >gmail.com>
To Michael P. Brown

Reply Reply All Forward

Thu 1/7/2021 11:26 AM

You replied to this message on 1/7/2021 11:27 AM.

Another thing I wanted to add: Kim and the other trolls all found my threat entertaining. They thought it was a joke.

No need to respond I know you are busy!

RE: One more thing



Michael P. Brown

To B Lori

Reply

Reply All

Forward

...

Thu 1/7/2021 11:27 AM

Hello. Do you have any evidence we could point to for that?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: One more thing



B Lori mail.com>
To Michael P. Brown

Reply Reply All Forward ...
Thu 1/7/2021 11:28 AM

I'll look.

On Thu, Jan 7, 2021 at 11:27 AM Michael P. Brown <mbrown@gordontilden.com> wrote:

Hello. Do you have any evidence we could point to for that?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

[600 University Street, Suite 2915](#)

[Seattle, Washington 98101](#)

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: One more thing



B Lor [jmail.com>](#)
To Michael P. Brown

Reply Reply All Forward ...
Thu 1/7/2021 1:38 PM

This twitter thread is from December 30. On my twitter profile I put this message on there for people to see hoping they wouldn't bother the other Lori and I would show proof that the work information shared was not me. I will send other tweets in another email so I can hopefully make them make sense!

[screenshots omitted]

Screenshots



B Lori
mail.com>
To Michael P. Brown

Reply Reply All Forward ...
Thu 1/7/2021 2:15 PM

You replied to this message on 1/7/2021 2:33 PM.

So sorry for this mess! This is embarrassing!

I made my tweet on May 2, 2020. I closed my account the next day May 3, 2020 so the tweet was gone within a day.

Kim didn't even see them until someone shared a screenshot. I created a new twitter account soon after. I still used my same picture so I wasn't trying to hide I just thought it would be a good idea and would cut down on the back and forth. They kept retweeting screenshots of my "threat" to make it appear as though I made threats all of them time when in fact I did not. They keep stating they have no idea why I would tweet such a thing and have no idea why I felt threatened well that's because they failed to show the threats that were made against me. Some of these other tweets are showing how they didn't take my "threat" seriously and laughed about it. I also always made it clear that I stood alone. I did not want anyone else involved in sticking up for me. I always told people not to defend me.

I am also including a screenshot of [REDACTED] sharing Katie's police report on the incident with her neighbors to show that she is the one that usually shared documents that shouldn't be posted.

Also, I sent you a tweet awhile back where [REDACTED] loxed me and said that I worked for the WA DOT and my full name which is a dox I've never shared my last name. So before salt filed that declaration I said that was not me and he filed it anyway.

They refer to me as lab rat. I would block people that wanted to start confrontation. On one of these tweets Kim finds it funny. Another tweet shows Kim saying that she has the balls so she isn't so innocent herself. Her twitter is all about hate and she tweets just about everyday about Katie.

[Screenshots omitted]

RE: Screenshots



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Thu 1/7/2021 2:34 PM

Thank you! Do you have the highlighted one handy to send again?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Screenshots



B Lori <[redacted]@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Thu 1/7/2021 3:03 PM

This one?

[Screenshots omitted]

Re: Screenshots



B Lori mail.com>
To Michael P. Brown

Reply Reply All Forward ...
Thu 1/7/2021 3:13 PM

You replied to this message on 1/7/2021 6:10 PM.

I think salt was mad that I tweeted his firm information. I tweeted it at him when I questioned who he was. Well one of his closest worker bees posted this (Katie's lawyer info). The account that tweeted this could be [REDACTED] but we will never know since they hide behind sock accounts.

Also my twitter had been private. (Meaning only the people I followed on twitter could see my tweets) for at least a month. I also blocked some accounts. I did this to cut down on conflicts. Some of these accounts have complained and laughed about me for this yet claim I am a bully.

[Screenshots omitted]

RE: Screenshots



Michael P. Brown
To: B Lori

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Thu 1/7/2021 6:11 PM

Thanks.

FYI I'm told they will be serving a subpoena on you tomorrow. I assume they have figured out your address.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Screenshots



Carrie L. Brown
To Michael P. Brown

Reply Reply All Forward ...

Thu 1/7/2021 6:13 PM

You replied to this message on 1/7/2021 6:16 PM.

Do they know I am not the other Lori yet? What should I do? sent me the dm's. Basically telling me to cooperate or else.

On Thu, Jan 7, 2021 at 6:11 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

Thanks.

RE: Screenshots



Michael P. Brown

To Carrie L

Reply Reply All Forward ...

Thu 1/7/2021 6:17 PM

I'm sorry if I've missed something but who is ' Which DMs?

Let's talk about the subpoena tomorrow morning if you can.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Fwd: Westbrook et al. v. Paulson et al. - Lori Ann Subpoena



Michael P. Brown

To L B

Reply Reply All Forward ...

Thu 1/7/2021 6:21 PM



1.7.21 Ltr to M. Brown & L. Barnhart Subpoena.pdf

406 KB

Here's the subpoena.

Get [Outlook for iOS](#)

Re: Screenshots



Carrie I @gmail.com>
To Michael P. Brown

You replied to this message on 1/7/2021 6:27 PM.

Reply Reply All Forward

Thu 1/7/2021 6:23 PM

Γ

Screenshot redacted



AA mobile.twitter.com C

Michael_Saltz

If you are a friend of Lori Ann, then you can tell her that we are not here for her.

Friday, 9:04 AM

However, because of her actions of inserting herself into our case, she is now a witness. As such, it is better to cooperate with us and to tell us what she knows privately and voluntarily.

Friday, 9:06 AM

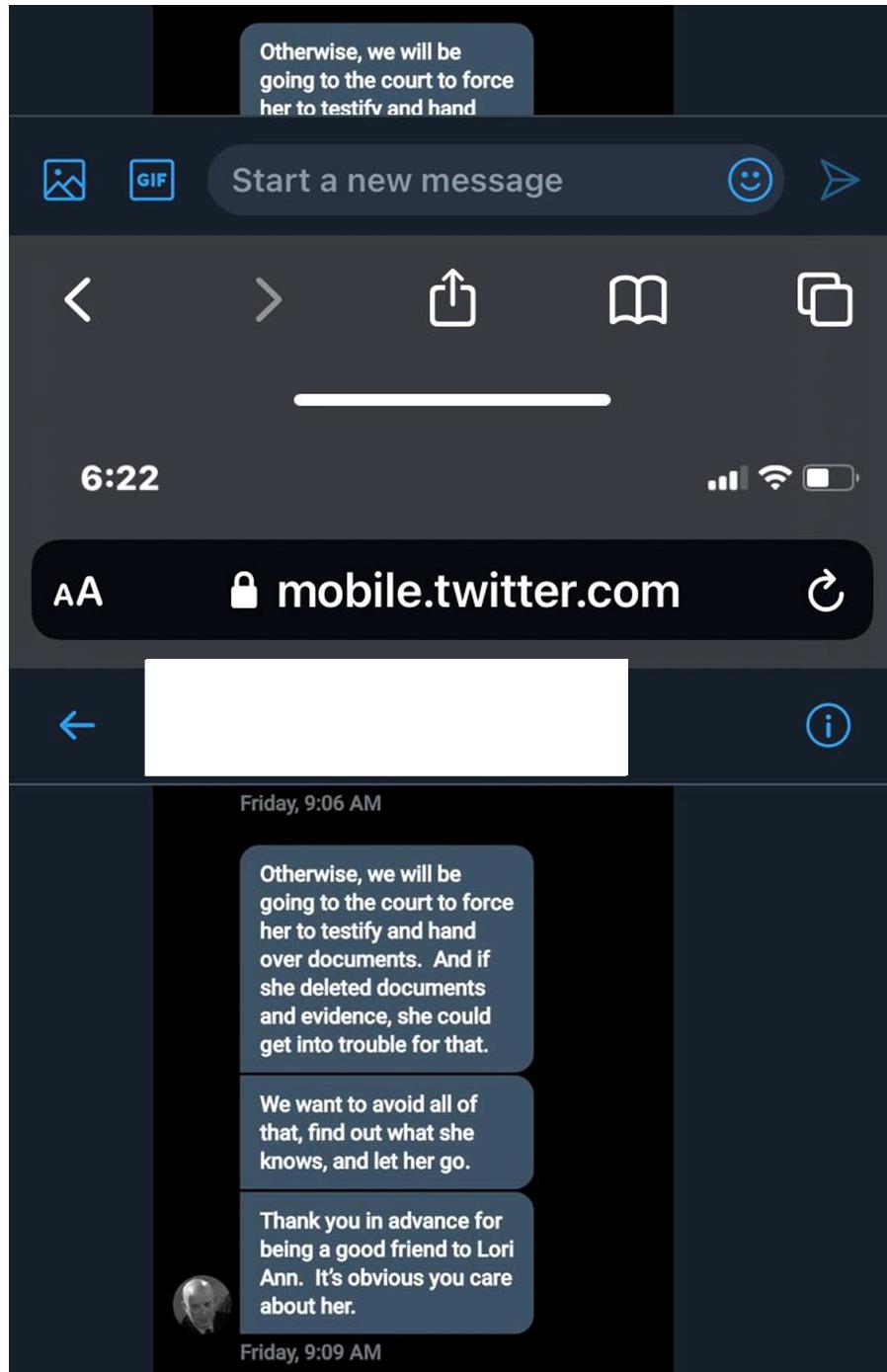
Otherwise, we will be going to the court to force her to testify and hand over documents. And if she deleted documents and evidence, she could get into trouble for that

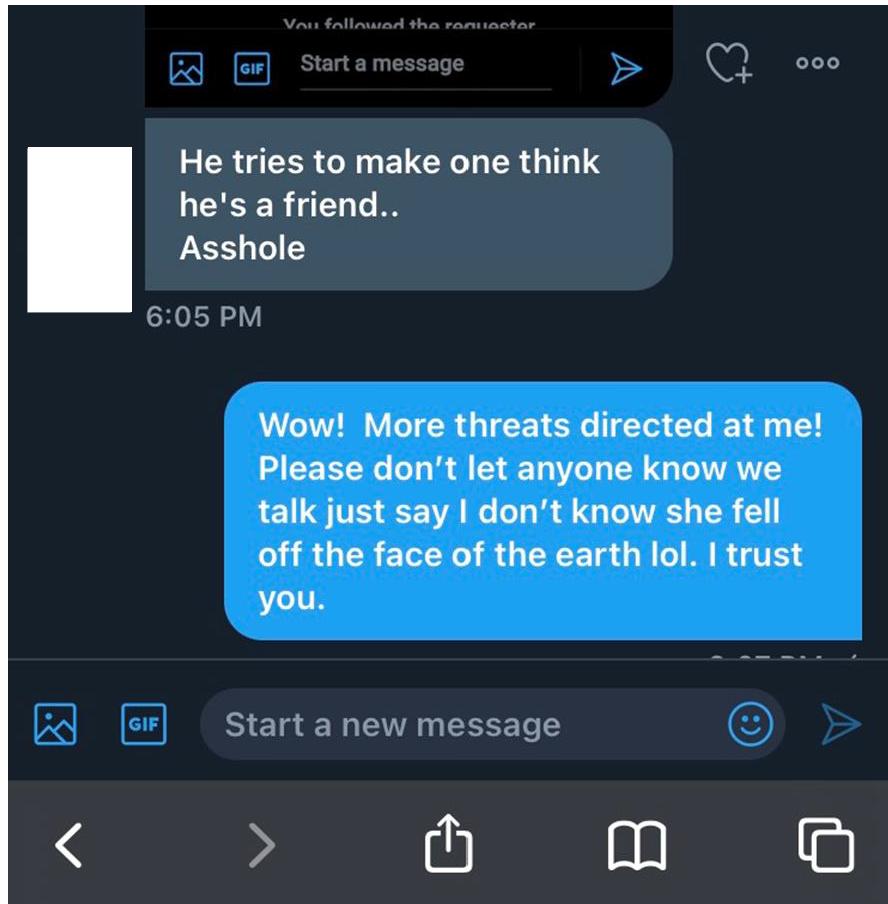
Start a message

Michael_Saltz

cooperate with us and to tell us what she knows privately and voluntarily.

Friday, 9:06 AM





RE: Screenshots



Michael P. Brown
To Carrie L

Reply Reply All Forward ...

Thu 1/7/2021 6:28 PM

He's ridiculous. Can you get me the whole screenshot of his message saying you could "get in trouble" for deleting tweets?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Screenshots



Carrie I mail.com>
To Michael P. Brown

Reply Reply All Forward ...
Thu 1/7/2021 6:28 PM

Yes. He won't stop.

On Thu, Jan 7, 2021 at 6:27 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

He's ridiculous. Can you get me the whole screenshot of his message saying you could "get in trouble" for deleting tweets?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

[600 University Street, Suite 2915](http://600UniversityStreet.com)

[Seattle, Washington 98101](http://SeattleWashington98101.com)

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



Re: Screenshots



Carrie L. Brown <bjr@clbrownlaw.com>
To: Michael P. Brown

Reply Reply All Forward ...

Thu 1/7/2021 6:47 PM

You replied to this message on 1/7/2021 8:14 PM.

Re: Screenshots



Michael P. Brown
To Carrie L

Reply Reply All Forward ...

Thu 1/7/2021 8:14 PM

Hi. Your last email was blank.

Get [Outlook for iOS](#)

REDACTED

Re: I'm so angry



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Fri 1/8/2021 7:20 AM

I totally understand. You have a right to object to the subpoena. At a minimum that would delay everything and the judge might just say you don't have to respond. I can help with that.

Get [Outlook for iOS](#)

Re: I'm so angry



B Lori
To <michael...@own>

gmail.com>

Reply Reply All Forward

Fri 1/8/2021 7:22 AM

You replied to this message on 1/8/2021 7:26 AM.

I think they still believe that I am that other Lori. I think she is going to get served. There isn't much information out there about me.

Re: I'm so angry



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Fri 1/8/2021 7:26 AM

Good point. I guess we'll find out soon.

Get [Outlook for iOS](#)

Re: I'm so angry



B Lori <lgolden@gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Fri 1/8/2021 7:27 AM

You replied to this message on 1/8/2021 7:34 AM.

I will let you know if I get anything.

On Fri, Jan 8, 2021 at 7:26 AM Michael P. Brown <mbrown@gordontilden.com> wrote:

| Good point. I guess we'll find out soon.

Re: I'm so angry



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Fri 1/8/2021 7:34 AM

Do you live in an apartment or house?

Get [Outlook for iOS](#)

Re: I'm so angry



B Lori < B.Lori@gmail.com>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Fri 1/8/2021 7:40 AM

In an apartment. It's a rather large complex and the office will not sign anything. If anyone comes and I am here I will take the papers.

Re: I'm so angry



B Lori |mail.com>
To Michael P. Brown

You replied to this message on 1/8/2021 4:49 PM.

Reply Reply All Forward

Fri 1/8/2021 7:41 AM

Do they know that I am not the other Lori? Or do you even know?

Re: I'm so angry



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Fri 1/8/2021 8:16 AM

I don't know if they know. If they knew it would make it even more remarkable that they haven't corrected the record.

I've been convinced that you are not her. You're willing to sign a sworn declaration saying so. That's generally a solid indication someone is telling the truth.

RE: I'm so angry



Michael P. Brown
To B Lori

Reply Reply All Forward ...
Fri 1/8/2021 9:38 AM

FYI, here's how the process plays out once you actually get the subpoena served on you formally:

1. You have 14 days to "object" to the subpoena. I might object on behalf of Katie also.
2. After that, you have no obligation to respond to it unless or until they go to court and convince it that you should be subjected to the burden of responding. That process will take a while. If the court decides you should respond, you will not be "in trouble" for not responding earlier. It just means you have to respond within a certain time after that court ruling.

You should not destroy any evidence related to this case or Saltz etc., now that you know it is going to be subpoenaed.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
 206.467.6477 206.805.3162
 gordontilden.com



RE: I'm so angry



Michael P. Brown
To B Lori

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Fri 1/8/2021 10:14 AM

BTW, I did not mean to suggest you should avoid being served with the subpoena. It will be best for you to play this "straight up" and make the legitimate objections once you have it.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: I'm so angry



Michael P. Brown
To B Lori

Reply Reply All Forward ...

Fri 1/8/2021 4:49 PM

Did you get a visit today?

Get [Outlook for iOS](#)

Re: I'm so angry



B Lori
To Michael P. Brown

gmail.com>

Reply Reply All Forward ...

Fri 1/8/2021 5:28 PM

You replied to this message on 1/8/2021 5:38 PM.

Nope. Do you know if a sheriff is asked to serve me and they have the wrong person will they give him my address?

Re: I'm so angry



B Lo gmail.com>
To Michael P. Brown

Reply Reply All Forward ...
Fri 1/8/2021 5:35 PM

You replied to this message on 1/8/2021 5:41 PM.

I guess I can just call him and authorize YouTube and twitter to give him all of it. I am caught in the middle. I used to volunteer for Snohomish county legal services maybe they can help me.

RE: I'm so angry



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Fri 1/8/2021 5:39 PM

I don't think the sheriff will "help" them in that way. Actually, I don't think the sheriff does process serving.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

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t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com



RE: I'm so angry



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Fri 1/8/2021 5:41 PM

What help do you think you'd need from legal services?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

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w: gordontilden.com



[1/8/21 Email from Ms. Barnhart to Mr. Brown. See (Sealed) Supplemental Brown Declaration, Ex. C-1.]

RE: I'm so angry



Michael P. Brown

To B Lori

Reply Reply All Forward ...

Fri 1/8/2021 5:56 PM

I understand. You really have nothing to worry about with this. You've done nothing wrong. I think I can help you with the response, for no charge. It's very simple.

Are you stressed about having a process server come?

I can talk if you want to call.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: I'm so angry



B Lori gmail.com>
To Michael P. Brown

Reply Reply All Forward ...

Fri 1/8/2021 6:05 PM

You replied to this message on 1/8/2021 6:31 PM.

If there are problems with how this message is displayed, click here to view it in a web browser.

It is very obvious that this behavior is legal. A successful high powered attorney that wins all his cases knows the law. I will let him continue with it. Everyone believes what he is saying about me. Over a million people know all about me.

Now I have put others at risk all over this. Because of me others are at risk too. They can show up at Lori's home or work, harass her and her family now too all thanks to me. I am done.

On Fri, Jan 8, 2021 at 5:56 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

I understand. You really have nothing to worry about with this. You've done nothing wrong. I think I can help you with the response, for no charge. It's very simple.

Are you stressed about having a process server come?

I can talk if you want to call.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

600 University Street, Suite 2915

Seattle, Washington 98101

t: 206.467.6477 **d:** 206.805.3162

w: gordontilden.com

Re: Checking in



Kara V. Brown |mail.com>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Sun 1/10/2021 4:52 PM

You replied to this message on 1/10/2021 6:13 PM.

Sorry I was a bit upset. I went to [REDACTED] twitter and she has a file of all the court docs. It's the first time I have read them. He's still allowed to this. Even if he served the wrong person there will be no accountability and he will continue to get more of my private information when I haven't done anything wrong. They will never admit their mistake. I'm sure they went through my divorce cases and will post all of that too since all of my "issues" will be broadcasted to over a million people that are following this case.

On Sun, Jan 10, 2021 at 8:46 AM Michael P. Brown <mbrown@gordontilden.com> wrote:
| Good morning. How are you doing?

On Sun, Jan 10, 2021 at 3:58 PM Kara V <kara.v@outlook.com> wrote:
I'm doing good thank you. I just shut my phone off and spent time with my grandkids.

Re: Checking in



Kara V [jmail.com](#)>
To Michael P. Brown

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Sun 1/10/2021 4:52 PM

You replied to this message on 1/10/2021 6:13 PM.

Sorry I was a bit upset. I went to [Twitter](#) and she has a file of all the court docs. It's the first time I have read them. He's still allowed to this. Even if he served the wrong person there will be no accountability and he will continue to get more of my private information when I haven't done anything wrong. They will never admit their mistake. I'm sure they went through my divorce cases and will post all of that too since all of my "issues" will be broadcasted to over a million people that are following this case.

RE: Checking in



Michael P. Brown
To Kara V

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Sun 1/10/2021 6:13 PM

I understand. I am preparing something to file tomorrow that addresses what they did to you, but does not require you to file any statement if you don't want to. I want the court to know what he's doing to harass you. I can't guarantee that the judge will do anything about it, but I want to try. His behavior is disgusting.

Please understand that, based on what you and Katie have told me, you have done **nothing** illegal. Also, the only issue in the case that you have any connection to (personal jurisdiction) is going to be decided soon, and you will no longer need to be involved in any way in this lawsuit.

I recommend that you sit tight, accept service if they come to your door, and then we can take it from there. You are not in any trouble.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Checking in



Kara V · gmail.com>
To · Michael P. Brown

Reply Reply All Forward ...
Sun 1/10/2021 6:38 PM

I think I just figured out what is going on. I was only close to one person during this time and I told her a lot about myself and how I was feeling about things.

They have used me to be the violent one. Since I lashed out and said those comments. They want my twitter messages between she and I. I told her I did have family that were rough.

Re: Checking in



Kara V
To Michael P. Brown

(i) You replied to this message on 1/10/2021 6:57 PM.

Reply Reply All Forward ...
Sun 1/10/2021 6:40 PM

They probably will add me now. So all because of me all of Katie's followers I crazy and violent about me

Re: Checking in



Michael P. Brown
To Kara V

Reply Reply All Forward ...
Sun 1/10/2021 6:57 PM

I don't see any angle that they could use to make a legal claim against you.

Get [Outlook for iOS](#)

Re: Checking in



Kara V gmail.com>
To Michael P. Brown

You replied to this message on 1/10/2021 8:59 PM.

Reply Reply All Forward ...

Sun 1/10/2021 7:16 PM

It's a much bigger picture. She was Facebook friends with me too. This is why they have been relentlessly after me since May. Trying to provoke me and make me angry. She knows I have relatives that are thugs and felons but I never communicated with them over this. I was being played this whole time. This is why salt keeps trying to entice me. He's saying if you don't turn over the information we will add you to the lawsuit. So is you giving the subpoena to me considered service now?

Can you tell me what is going on with the other Lori? Does she know about this?

Re: Checking in



Kara \ jmail.com>
To Michael P. Brown

You replied to this message on 1/10/2021 9:22 PM.

Reply Reply All Forward ...

Sun 1/10/2021 7:21 PM

Or did you already know this?

(no subject)

 Kara V [gmail.com](mailto:kara.v@gmail.com)>
To  Michael P. Brown

 You replied to this message on 1/11/2021 8:02 AM.

Reply Reply All Forward ...

Sun 1/10/2021 7:31 PM

I will call him tomorrow

Re: Checking in



Kara gmail.com>
To Michael P. Brown

You replied to this message on 1/10/2021 8:59 PM.

Reply Reply All Forward ...
Sun 1/10/2021 7:52 PM

Unfortunately I see who the slime ball is now.

RE: Checking in



Michael P. Brown
To Kara V

Reply Reply All Forward ...
Sun 1/10/2021 9:00 PM

Who?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



RE: Checking in



Michael P. Brown
To Kara V

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Sun 1/10/2021 8:59 PM

You have NOT been served with the subpoena yet. You did not authorize me to accept it on your behalf, so the fact that I sent it to you does not mean it was served on you. They do not know you and I are in contact.

All you need to do is respond if and when you are served, and not destroy any evidence that the subpoena asks for. It is not a problem if you deleted stuff before you knew you were subpoenaed. They cannot sue you just because you have some information they want. I have not heard anything that would suggest you defamed anyone.

I have not heard back from the lawyer at the DOT yet. I'll call him again tomorrow morning.

When you say "she" was Facebook friends with you, do you mean Katie or someone else?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Re: Checking in



Michael P. Brown

To Kara V

Reply Reply All Forward ...
Sun 1/10/2021 9:22 PM

I'm sorry but I'm confused by your messages this evening. Are you saying you and Katie were Facebook friends or are you referring to someone else?

I'm available to talk if you'd like.

Get [Outlook for iOS](#)

RE:



Michael P. Brown

To Kara V

This message was sent with High importance.

Reply Reply All Forward ...

Mon 1/11/2021 8:02 AM

Can you please talk with me before you do anything? I think there has been some misunderstanding and I'd like to have a chance to clear it up. We will be filing an objection today to Saltz's latest "declaration" and I'd like to include a statement from you if you are on board with that.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



REDACTED

Re: Checking in

 Michael P. Brown
To Kara V

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Mon 1/11/2021 9:10 AM

I don't see anything that would get you in legal trouble. You don't need to spend money or hire a lawyer to respond to the subpoena or file a declaration.

I'd like to stand up for you by filing your declaration if you'd let me. It costs you nothing.

Get [Outlook for iOS](#)

REDACTED

Re:



Michael P. Brown

To Kara V

Reply Reply All Forward ...
Mon 1/11/2021 9:21 AM

Lori, you're wrong about me not believing you. I have taken you at your word throughout this.

I don't know what you mean that we agreed to give them what they want. Can you explain?

Can we please discuss this on the phone? I really think you will feel better if we do.

Get [Outlook for iOS](#)

RE: Re:



Michael P. Brown

To Kara V

Reply

Reply All

Forward

...

Mon 1/11/2021 3:16 PM

We're filing something today that addresses the threat Saltz recently made to you, communicated through Cathey Gunkey. It would be great if you would state that you took it as a threat and felt intimidated etc. But it's up to you obviously.

Even if you do not want to file anything in support of Katie's defense, I can give you some assistance with respect to responding to the subpoena. Have you been served?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



REDACTED

Re:



Michael P. Brown
To Kara V

[Reply](#) [Reply All](#) [Forward](#) [...](#)
Mon 1/11/2021 8:50 PM

I understand this is very stressful. You should at least speak with me about it.

Get [Outlook for iOS](#)

REDACTED

REDACTED

REDACTED

From: [B Lori](#)
To: [Michael P. Brown](#)
Subject: Re: Twitter
Date: Wednesday, January 6, 2021 3:30:17 PM

Sounds great! It still says Katie Paulson at the top right about where it says I am over the age of 18. I don't think it matters here but those videos will be around forever with that private information. I will look for how much the tweets totaled that night.

On Wed, Jan 6, 2021 at 3:19 PM Michael P. Brown <mbrown@gordontilden.com> wrote:

I added a lot of stuff so please read it carefully and let me know what we should change.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP

One Union Square

[600 University Street, Suite 2915](#)

[Seattle, Washington 98101](#)

t: 206.467.6477 **d:** 206.805.3162

w: [gordontilden.com](#)

RE: Lori



Michael P. Brown
To Lori A

Reply Reply All Forward ...
Sun 12/27/2020 10:14 AM

I do not think the divorce records are publicly available, but I could be wrong about that.

Here's what we can do in response to this filing. We will object that the personal information is totally irrelevant and part of a campaign to intimidate and harass anyone who is perceived to support Katie. We will prepare a declaration for you to review and sign, which we will file along with our response to their filing. Unfortunately, I do not believe there is any way for you to sue them for money over this, because of a rule that says you cannot sue over something that is filed in court as part of a lawsuit. But what we can get for you is a public objection, maybe a disincentive for them to keep doing it, and hopefully the court issuing a ruling saying what they did was wrong and telling them to stop.

Does that sound okay?

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Ex. C

Westbrook v. Paulson - Court Filing



Michael P. Brown
To jwsdot.wa.gov

Reply Reply All Forward ...
Sat 12/26/2020 7:32 AM

You forwarded this message on 1/14/2021 4:04 PM.

Ms. Barnhart:

I represent Ms. Paulson in the federal lawsuit currently pending in Seattle against her, brought by Tatiana and James Westbrook. I have reason to believe that the Westbrooks filed a document on Wednesday incorrectly identifying you as a person who has some connection to the lawsuit, and including your work email address and phone number.

If this is the case, I would appreciate the opportunity to discuss this with you.

Thank you.

Michael Brown

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Ex. D

Filing re Lori Barnhart



Michael P. Brown
To: <redacted>@atg.wa.gov

Reply Reply All Forward ...

Mon 12/28/2020 9:56 AM

Dkt. 29 Fulmer Decl.pdf 2 MB

See pp 5-6.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 **d:** 206.805.3162
w: gordontilden.com



Ex. E

 Michael_Saltz
@MichaelSaltzEsq

Replying to @Bloodtall

Lori Ann: I'm in the office after court in the morning. You have the address. How about you meet me there? You can try to convince me that I am an imposter, and I can show you why the complaint I drafted to sue someone making false accusation of a crime has merit. It will be fun!



4:40 Thread Lori Ann @Bloodtall Seems like someone may be pretending to be a lawyer. I think we found DOE number 1. Yes. This case is going to court. And by the looks of your account, if you are not already a party to the lawsuit I drafted (which is not a laughing matter), you very well will be soon once we determine who you are.

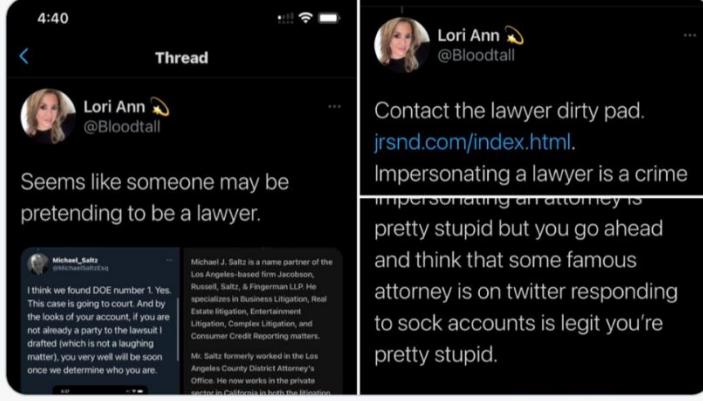
Lori Ann @Bloodtall Contact the lawyer dirty pad. jrsnd.com/index.html. Impersonating a lawyer is a crime

Michael J. Saltz is a name partner of the Los Angeles-based firm Jacobson, Russell, Saltz, & Figerstein LLP. He specializes in Business Litigation, Real Estate Litigation, Entertainment Litigation, Complex Litigation, and Consumer Credit Reporting matters. Mr. Saltz formerly worked in the Los Angeles County District Attorney's Office. He now works in the private sector in California in both the litigation

6:50 AM · Nov 4, 2020 · Twitter for iPhone

 Michael_Saltz @MichaelSaltzEsq · Nov 4, 2020
Replying to @Bloodtall @shenspantyliner and 3 others

Lori Ann: I'm in the office after court in the morning. You have the address. How about you meet me there? You can try to convince me that I am an imposter, and I can show you why the complaint I drafted to sue someone making false accusation of a crime has merit. It will be fun!



4:40 Thread Lori Ann @Bloodtall Seems like someone may be pretending to be a lawyer. I think we found DOE number 1. Yes. This case is going to court. And by the looks of your account, if you are not already a party to the lawsuit I drafted (which is not a laughing matter), you very well will be soon once we determine who you are.

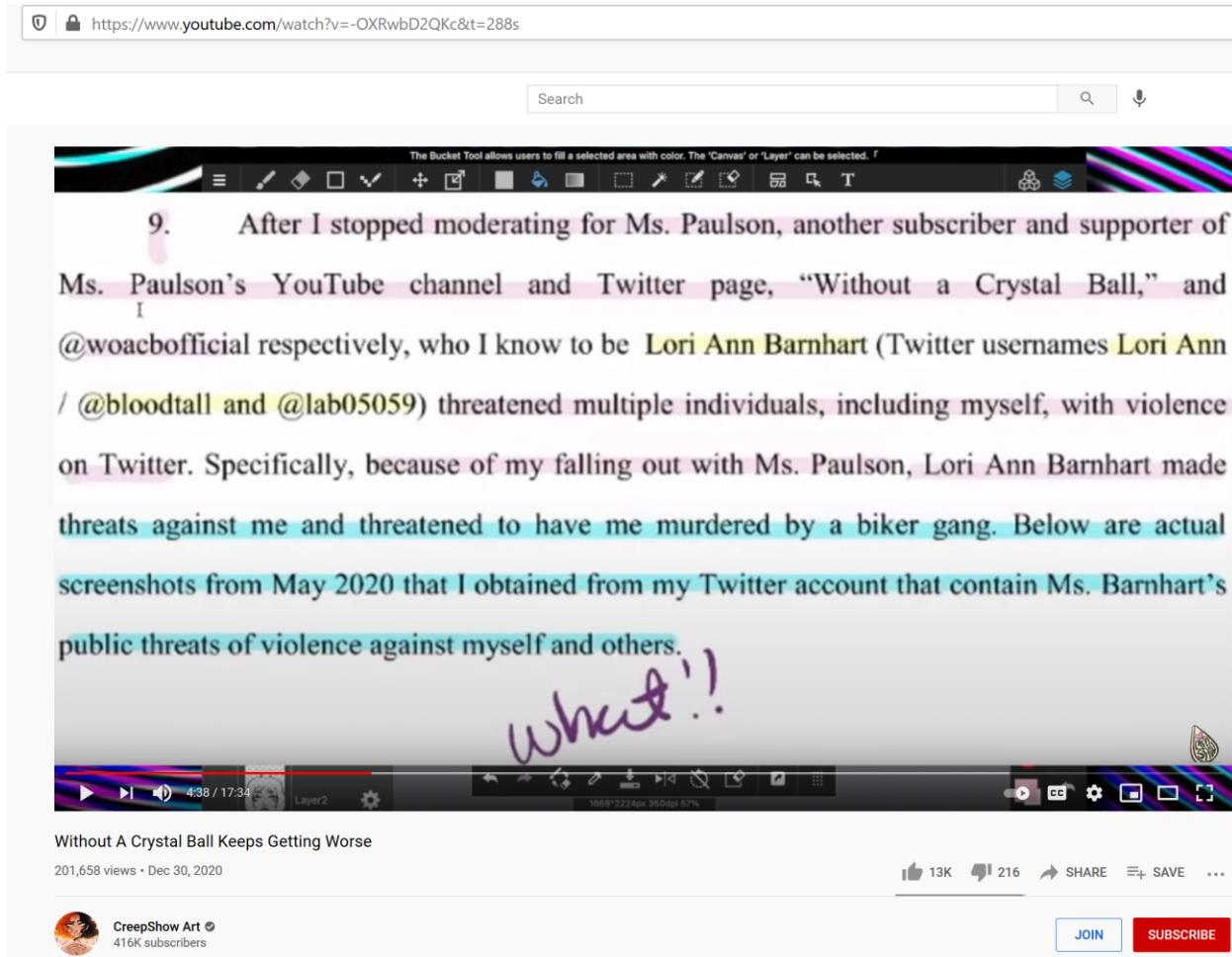
Lori Ann @Bloodtall Contact the lawyer dirty pad. jrsnd.com/index.html. Impersonating a lawyer is a crime

Michael J. Saltz is a name partner of the Los Angeles-based firm Jacobson, Russell, Saltz, & Figerstein LLP. He specializes in Business Litigation, Real Estate Litigation, Entertainment Litigation, Complex Litigation, and Consumer Credit Reporting matters. Mr. Saltz formerly worked in the Los Angeles County District Attorney's Office. He now works in the private sector in California in both the litigation

8 5 59

Michael_Saltz @MichaelSaltzEsq · Nov 4, 2020

Ex. F

A screenshot of a video player interface from YouTube. The URL in the address bar is https://www.youtube.com/watch?v=-OXRwbD2QKc&t=288s. The video title is "Without A Crystal Ball Keeps Getting Worse". The channel is "CreepShow Art" with 416K subscribers. The video has 13K likes and 216 dislikes. The video duration is 16:49 and it was uploaded on Dec 30, 2020. The video content shows a text overlay on a video frame. The text reads: "9. After I stopped moderating for Ms. Paulson, another subscriber and supporter of Ms. Paulson's YouTube channel and Twitter page, "Without a Crystal Ball," and I @woacbofficial respectively, who I know to be Lori Ann Barnhart (Twitter usernames Lori Ann / @bloodtall and @lab05059) threatened multiple individuals, including myself, with violence on Twitter. Specifically, because of my falling out with Ms. Paulson, Lori Ann Barnhart made threats against me and threatened to have me murdered by a biker gang. Below are actual screenshots from May 2020 that I obtained from my Twitter account that contain Ms. Barnhart's public threats of violence against myself and others." A large purple hand-drawn style exclamation mark is overlaid on the text. The video player has a dark theme with various icons for volume, brightness, and other controls.

Ex. G

① 🔒 https://www.youtube.com/watch?v=YDmAxCloPpo

emily d baker

The video player displays a legal document titled "PRAECIPE TO PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS (DKT. NO. 27)". The document is dated January 2021 and filed in Case 2:20-cv-01606-BJR. It lists "BEAUTY PARTNERS, LLC, a Nevada Limited Liability Company" as plaintiffs and "KATIE JOY PAULSON, an individual; WITHOUT A CRYSTAL BALL, LLC, a Minnesota Limited Liability Company; and DOES 1 through 100, inclusive" as defendants. The document states that plaintiffs seek to add a declaration showing additional factual support for their argument in Docket 27 at pages 14–15. Below the document, there is contact information for Carroll, Biddle, & Bilanko, PLLC, located at 1000 2nd Avenue, Suite 3100, Seattle, WA 98104. On the left side of the video player, there is a small video feed of a woman with glasses, identified as @TheEmilyDBaker, speaking. The video player interface shows standard controls like play, pause, and volume, along with viewer statistics (5.4K likes, 40 dislikes, share, save, and more).

#TatiWestbrook #Defamation #LawyerReacts
Coffee & Cursey Words Live: Girardi Updates & New Filing in the Westbrook Defamation Case

67,302 views • Streamed live on Jan 5, 2021

PRAECIPE - I
(2:20-CV-01606-BJR)

NO. 2:20-cv-01606-BJR

Plaintiffs,
v.
KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,
Defendants.

PRAECIPE TO PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS (DKT. NO. 27)

Pursuant to LCR 7(m), Plaintiffs submit this praecipe to add an additional document in support of their previous filing, Plaintiffs' Opposition to Defendants' Motion to Dismiss, Docket Number 27. Specifically, Plaintiffs seek to add into the record a declaration showing additional factual support for Plaintiffs' argument in Docket 27 at pages 14–15 that Defendants derive income from Washington through publication of defamatory content.

CARROLL, BIDDLE, & BILANKO, PLLC
1000 2nd Avenue, Suite 3100
Seattle, WA 98104

1:00:05 / 2:20:42 • Tati Westbrook Updates > YouTube

5.4K 40 SHARE SAVE ...

Ex. H



Kay @KayOpinionated · Nov 2

People are saying you are not a real attorney and not the Westbrook's attorney. Can you confirm?

2

1

1

1

...



Michael_Saltz @MichaelSaltzEsq · Nov 2

Kay Baxter: With my name on the pleadings wherein I made very serious and detailed claims against your friend, Ms. Paulson, and with the articles below speaking to my tenaciously obtained legal victories, why would you troll me and draw our team's prosecutorial attention to you?

...

Ex. I



Cathey Gunkey @cathey_gunkey · Jan 1

•••

Lori Ann used to be a loyal viewer. No longer! She did a super chat to say you were harassing her. She is not KJ's friend. That was a joke. Please leave this private person alone. You are causing harm to her health. Please, I beg you to leave her out of this.

5

↑↓

♡

↑

Ex. J

← **Tweet**



Michael_Saltz
@MichaelSaltzEsq

...

Thank you Lori Ann. You are a class act.

5:01 PM · Jan 13, 2021 · Twitter Web App

48 Retweets **34** Quote Tweets **1.2K** Likes

